

## **Sequential Site Assessment**

YTL Arena Complex, Brabazon Hangar, Filton

November 2019

## Contents

|    |  |    |
|----|--|----|
| 1. | Introduction .....   | 1  |
| 2. | The Proposal .....   | 5  |
| 3. | The Approach to the Sequential Test and the Assessment of Alternatives ..... | 14 |
| 4. | Assessment of Alternatives.....  | 29 |
| 5. | Summary and Conclusions.....   | 33 |

## Appendices

- Appendix I Temple Island
- Appendix II Newfoundland Way
- Appendix III Fruit Market
- Appendix IV Hengrove Park
- Appendix V Proposed UWE Stadium Site
- Appendix VI The Galleries, Broadmead
- Appendix VII Bristol City FC
- Appendix VIII Horsefair / Callowhill Court
- Appendix IX Union Street / Silver Street / All Saints Street
- Appendix X Redcliffe Village
- Appendix XI Avonmeads Retail Park
- Appendix XII Long List of Alternatives
- Appendix XIII Financial Analysis

# 1. Introduction

## Overview

- 1.1 This report has been prepared by Avison Young ('AY') for YTL Developments (UK) Ltd ('YTL') in relation to a proposed mixed use arena development at the Brabazon Hangar site in Filton, Bristol ('the Site'). It addresses the sequential test which is a key planning policy test in the development plan for the local area and national planning policy for main town centre use<sup>1</sup> proposals located outside of town centres.
- 1.2 The proposal at the Site is one of a series of development and associated works proposals to enable the implementation of the YTL Arena Complex project ('the Project'). Overall, the Project comprises the following:
- Change of use, refurbishment and external alterations to the Brabazon Hangar building
  - Construction of a pedestrian bridge over the Henbury railway line, connecting the hangar to Filton Airfield
  - Demolition of existing 'out buildings' around the hangar and alterations to existing hard-standing areas
  - Alterations to the Charlton Road / West Way road junction
  - Construction of permanent car parking provision on the airfield site<sup>2</sup>
  - Construction of access roads on the airfield site<sup>3</sup>
  - Temporary car parking provision on the airfield site

- 1.3 The four submitted applications in respect of the Project are as follows:

Application A: "*Hybrid planning application comprising the demolition of existing ancillary buildings and structures; full details associated with the change of use of, and associated external alterations to, the Brabazon Hangar building from Class B8 use to a mixture of Class D1, D2, A1, A3, A4 and B1a uses, along with outline details associated with infrastructure works including: revised vehicular access arrangements; redevelopment and reorganisation of the former aircraft apron to provide parking, servicing and associated infrastructure provision; plus associated landscaping, service infrastructure and other associated works and improvements.*". Application site: Brabazon Hangar and surrounding land, West Way, Bristol, BS34 7DU (being the Site).

Application B: "*Amendments to existing highway and highway junction at Charlton Road and West Way*"  
Application site: Charlton Road and West Way, Bristol.

---

<sup>1</sup> Main town centre uses are described in Annex 2 of the 2018 National Planning Policy Framework as: "Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)".

<sup>2</sup> The former Filton Airfield which ceased operation in 2012. These works will be undertaken via a planning permission granted by SGC on the former Filton Airfield site 14/3867

<sup>3</sup> these works will be undertaken via a planning permission granted by SGC on the former Filton Airfield site 14/3867

Application C: "*Application for temporary planning permission for the parking for up to 2,000 vehicles along with car and taxi drop off areas, bus stopping areas on the eastern end of the former Filton Airfield and associated uses*" Application site: former Filton Airfield, South Gloucestershire, BS99 7AR

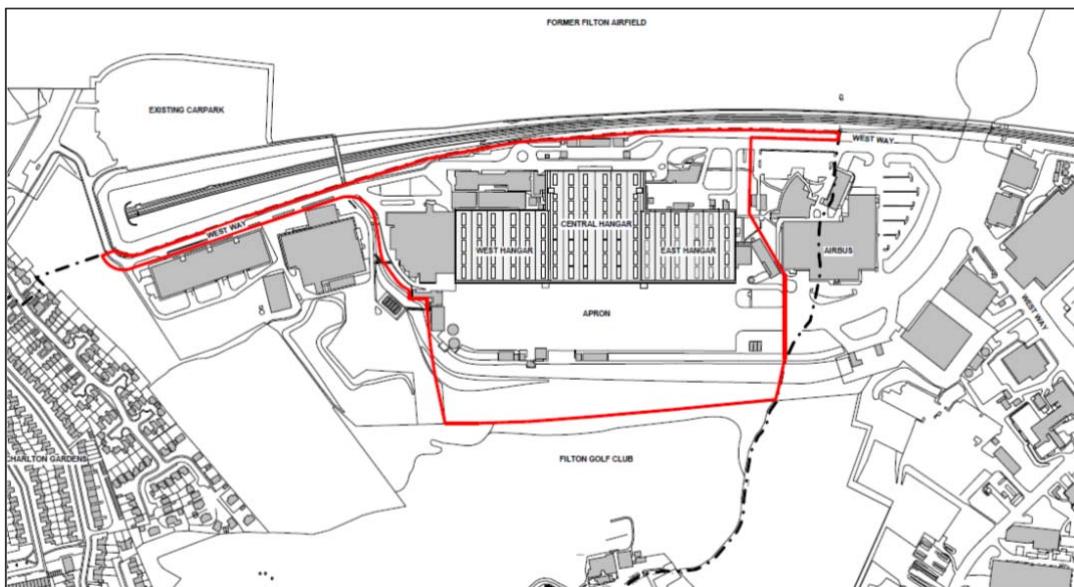
Application D: "*Construction of a new pedestrian [and cycle?] bridge link between the former Filton Airfield and the Brabazon Hangar site over the Henbury Loop railway line, including earthworks and associated development*" Application site: former Filton Airfield, South Gloucestershire, BS99 7AR

- 1.4 The content of this document is intended to support Application A.
- 1.5 A full description of the proposed development in Application A is contained in the next section of this document although, in summary, the proposal comprises:
  - The change of use of the Brabazon Hangar from Class B8 use to Use Classes A1/3/4, B1 and D1/D2, including:
    - Within the Central Hangar, a 17,000 capacity arena auditorium is proposed, being accommodated within circa 42,000sq m of floorspace.
    - Within the two adjacent hangars, it is proposed to provide The Hub and Festival Hall elements. The Festival Hall is proposed to be a flexible event and exhibition space comprising a ground floor level event hall (5,800sq m), with a further 800sq m associated with 'back of house' space and 3,400sq m of flexible space for smaller events and meeting rooms<sup>4</sup>. The Festival Hall is intended to be used in conjunction with large scale events in the main arena auditorium. The Hub will be 18,450sq m of mixed use space for leisure and food and beverage uses.
  - External works to the hangar building along with demolition of existing ancillary buildings surrounding the hangar and redevelopment to provide parking and servicing provision along with associated ancillary infrastructure works.
- 1.6 All of the above uses (apart from D1) are classified as main town centre uses under the definition in the February 2019 version of the National Planning Policy Framework ('NPPF'). As a consequence, there is a requirement for the forthcoming planning application for this development proposal to consider whether there are any suitable and available alternative sites or premises in sequentially preferable locations which can accommodate the proposal. This approach is outlined in Policy DM7 of the Bristol Site Allocations and Development Management Policies Plan (2014), plus paragraphs 86 and 87 of the NPPF. A more detailed overview of salient planning policy on the sequential test can be found in Section 3 of this document.
- 1.7 The planning application 'red line' site area for Application A falls with BCC's administrative area. The extent of this area is shown in Figure 1.1 below.

---

<sup>4</sup> Giving a total of 11,000sq m, including a lobby of 1,000sq m

*Figure 1.1 – Application A site area*



1.8 The overall aim of this document is to demonstrate the following aspects in relation to the sequential test:

- That the applicant has followed a robust approach to the application of the sequential test for this particular proposal including:
  - The assessment of suitability and availability of alternative sites and premises;
  - The assessment of flexibility in scale and format when considering alternatives.
- That all appropriate alternative sites and premises have been considered as part of the sequential test.
- There are no sequentially preferable alternative sites or premises which can provide a suitable and available alternative for the proposed development.

1.9 In order to assist AY with the preparation of this document, contributions have been made by architects Grimshaw (on the testing of the capacity of alternative sites and premises) and transportation consultants Hydrock (on accessibility issues).

### **The Application Site (Application A)**

1.10 Originally known as the Aircraft Assembly Hall, the Brabazon Hangar was built in the 1940s and became operational in 1947, being used for the construction of the Brabazon Mark I passenger airliner. It was subsequently used for the construction of other aircraft, most notably Concorde. Commercial activity in the Brabazon Hangar associated with the construction and maintenance of aircraft ceased in 2009. Subsequently, BCC granted planning permission (11/04294/F) for the change of use of the hangar and surrounding land from Class B2 use to Class B8 use in 2012. The hangar has previously been assessed for listing on two separate occasions, but on both occasions English Heritage has decided not to add it to the list.

- 1.11 The hangar itself comprises three very large bays. The central bay is the largest and projects forward to the north and is deeper than the flanking bays. The building faces away from the runway at the Airfield (located to the north) on to a large concrete apron which links to the Airfield to the east of the building.
- 1.12 To the east and west of the site are uses associated with aerospace industry, most notably the Airbus UK works to the east and south-east. To the south of the site is Filton golf club. To the north, on the opposite side of the Henbury Spur railway line, lies the former Filton Airfield area which has outline planning permission (granted by South Gloucestershire Council ('SGC')) for a large-scale mixed use development.

### **Content of this Report**

- 1.13 The remainder of this document is structured in the following manner:
- Section 2 outlines the content of the proposed development and the justification for the presence and contribution of the individual land use elements in the wider application package.
  - Section 3 explains YTL's approach to the sequential test, including the approach to demonstrating flexibility in scale and format, the area of search for alternatives, the approach to the assessment of alternative sites and premises and how the 'short list' of alternatives has been arrived at.
  - A detailed assessment of seven alternative sites across the Bristol area can be found in Section 4.
  - A summary of the contents of this report can be found in Section 5.
- 1.14 All site assessment proformas and other documents referred to in the main text of this document can be found in appendices.

## 2. The Proposal

### Content of the Proposed Development

- 2.1 The submitted planning application (Application A) will contain proposals for the change of use of the Brabazon Hangar, plus physical alterations to the building along with physical works to the surrounding area to provide a mixed use development which will include leisure, retail and workspace land uses.
- 2.2 The proposed change of use of the existing Brabazon Hangar building will provide for the land uses set out in paragraph 1.5.
- 2.3 Associated with the change of use of the Brabazon Hangar building for the above land uses, there will be a series of external alterations to the building and its roof. The existing cladding and roofing across the hangars (originally fitted in the 1980s) will be removed and replaced with new cladding which will significantly enhance the appearance of the building whilst respecting a number of key heritage features.
- 2.4 In addition to the above, the following is also proposed as part of the Project:
- Re-organisation / redevelopment of areas of existing hardstanding around the existing hangar building (Application A).
  - In addition to the use of existing and new access points from Hayes Way and the A38 granted under the outline permission on the former airfield (see below) re-organisation of an existing access to the north-west of the application site known as 'the west gate' (Application B).
  - Temporary car parking on part of the former runway (Application C)
  - A new pedestrian bridge over the Henbury Spur railway line in order to allow access to the Brabazon Hangar building from the Filton Airfield site (Application D).
- 2.5 YTL intends to utilise the existing, updated and proposed new access points from Hayes Way and the A38 in order to provide the majority of accesses into the Project. It also intends to utilise the car parking areas which have been approved under the outline permission on the airfield. Detailed approval has already been granted for the A38 and Hayes Way junctions whilst reserved matters have been approved for the 'U road' which links the Brabazon and Blenheim roundabouts on Hayes Way. In addition, two geographic design codes have also been approved by South Gloucestershire Council which provide further detail on the infrastructure which will be utilised to access the main arena mixed use development. Where temporary car parking arrangements on the former airfield site are required, these will be pursued under Application C.

### The Business Case for the Content of the Proposal

- 2.6 Bristol is the only core city in the UK without an arena. The ability to rectify this situation will sit high on the list of key objectives for any such city and it has been well-known that the public sector across the wider Bristol urban area has had an aspiration over the past decade to deliver an arena for Bristol.

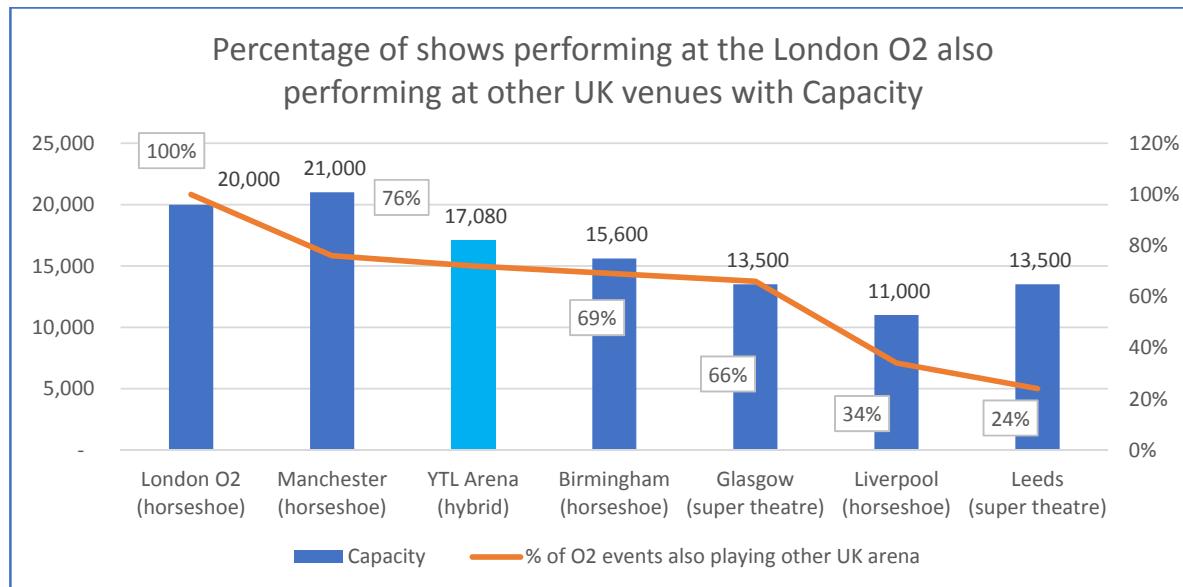
- 2.7 Several attempts have been made by the public and private sectors in recent years. The latest attempt was led by BCC on the Temple Island site (adjacent to Temple Meads railway station) with the intention that the public sector acquired the land necessary for the arena, gained planning permission for the development and then procured a private sector partner who would operate the arena.
- 2.8 By 2018, the project was well advanced, with (A) the site for the arena in public ownership, (B) outline planning permission for the arena granted in April 2016, and (C) contracts between BCC and the contractor and operator secured. However, between 2016 and 2018 the delivery of the project slowed down in momentum and BCC's Cabinet resolved to abandon the project in September 2018.
- 2.9 Within a suite of documents presented to Cabinet in September 2018 in order to assist with its decision, the Executive Summary report noted:
- "Developments of cultural assets, such as arenas, normally require public sector intervention and funding, because in general the returns realised are not sufficient for them to be funded by private sector investment".*
- 2.10 The report noted that a 12,000 capacity arena on the Temple Island site would require public sector investment of £173m and BCC would bear the development risk alongside the contractor. It also noted that if BCC decided to build the arena then there would clearly have been pressure on alternative budgets to deliver other Council priorities. The value for money review undertaken by KPMG for BCC also concluded that in the case of the Temple Island proposal:
- "the Arena is not a commercially viable proposition without public support".*
- 2.11 There are two particular aspects of the BCC arena plan for the Temple Island site which require highlighting. First, the scheme which gained full planning permission for the main arena use did not contain any supporting land uses. Second, whilst outline planning permission was granted on the remaining part of the Temple Island site, a decision was taken to dispose of the rest of the site to the University of Bristol for student residential accommodation associated with a new post-graduate campus (i.e. there were no supporting uses to improve and reinforce viability). These factors will have been taken into account by BCC in the overall assessment of commercial viability and the ultimate decision by BCC to choose an alternative mixed use development scheme for Temple Island. For the avoidance of doubt, there are no other alternative proposals for a large arena in either Bristol city centre or in the wider urban area of the city apart from YTL's current proposal.
- 2.12 YTL shares the vision to provide Bristol with a world-class arena and bring it into line with the other UK core cities. Having considered the benefits which an arena will have for the whole of Bristol, including the assessment made by KPMG in 2018 of the economic case, YTL has decided to propose an arena, within a wider mixed use development on the Site. YTL has already invested heavily in the Filton area via the purchase of the Airfield and gaining a revised outline planning permission for a mixed use redevelopment on the Airfield site.
- 2.13 Given the comments made in relation to the arena project on the Temple Island site, YTL recognises that an alternative form and content of development is needed to deliver and successfully operate a viable arena use. First, the core arena use must be large enough to accommodate a range of events. In particular, to give Bristol the best chance of attracting the best entertainment events the capacity of the arena must be

one of the largest in the country. The Temple Island arena would have had a capacity of 12,000 making it one of the smallest of the 7 modern city arenas in the country (with only Liverpool having a smaller capacity). YTL is of the understandable view that a larger capacity arena will clearly be able to generate higher volumes of attendance, attract a more diverse set of events, and thus increase revenue. This is one of the reasons for proposing a 17,000 capacity arena auditorium at Filton. YTL is also of the view that a large capacity auditorium will be better able to attract the largest entertainment acts in and from outside of the UK thus further increasing its attractiveness and viability.

- 2.14 For YTL Arena to attract a wide variety and high-profile events, securing its place as a 'must play' venue, it needs to be one of the UK's largest. At 17,000 capacity it will become the third largest after Manchester and the O2. Taking the O2, ranked the world's most popular arena by Pollstar, as the benchmark, it is clear that UK arenas with a capacity below 15,000 only attract a fraction of the shows and a key reason why the proposed YTL arena is of the size that it is. See Table 2.1 below.

*Table 2.1: comparison between UK's largest arenas*

| Venue                       | London O2 | Manchester | Glasgow | Birmingham | Liverpool | Leeds  |
|-----------------------------|-----------|------------|---------|------------|-----------|--------|
| Capacity                    | 20,000    | 21,000     | 13,500  | 15,600     | 11,000    | 13,500 |
| % of artists playing the O2 |           | 76%        | 66%     | 69%        | 34%       | 24%    |



- 2.15 Second, the arena auditorium must be flexible enough to allow for different combinations of seating and standing areas for different types of events. This will enable it to hold more events to increase the stream of revenue. There is also a need for a sufficient amount of supporting accommodation in the core arena area including hospitality areas and boxes and the design for the YTL arena will achieve this. Arenas are historically designed following one of two models, the traditional 'horseshoe' or the more contemporary 'Super Theatre'. Horseshoe arenas are typically designed around an ice hockey floor space which are widespread across North America and Europe. More recently Super Theatre based designs have developed

and are more focused for music performances. YTL Arena is a hybrid bowl design allowing maximum flexibility and attracting a broad variety of event types.

- 2.16 Third, bearing in mind the comments of BCC in relation to other existing arenas across the country, in order to provide a viable and successful arena, built and operated by the private sector, a number of additional land use component parts are required. There will be a need for supporting related uses to (A) provide an on-going source of income, and (B) make the arena more attractive by their very presence in the wider development.
- 2.17 It is for these reasons that the following uses are proposed to be incorporated into the arena mixed use development: The Hub area (18,450sq m) comprising food and beverage and leisure land use accommodation along with the Festival Hall (11,000sq m) for exhibition and large event facilities. The reasoning for the inclusion of these uses is both functional and financial in nature and are explained below.

*Functional relationship*

- 2.18 The space within The Hub area is a vital part of ensuring that land uses which are functional and financially related to the arena use are provided. These include the food/beverage and retail uses<sup>5</sup> which will be used extensively both before and after events and are a core requirement from visitors wishing to make their trip to the YTL Arena a memorable one. They are also a key source of income for the project and some of the food and beverage facilities will also be open throughout the day during event and non-event days in order to serve the daytime workforce in the workspace (see below) and also other visitors to the site.
- 2.19 The workspace element of The Hub will also provide functional and financial linkages to the main arena use and overall project. YTL's aim is to provide flexible workspace which has a functional relationship to the entertainment, arts and catering use of the arena. In order that the proposed development maintains vitality throughout the working day, the workspace will help to increase employment opportunities in the local area and enhance the arena's credentials as a cultural hub for entertainment and the arts. In order to make the workspace successful, the presence of food and beverage floorspace within The Hub will be important in order to serve the day to day needs of the workforce.
- 2.20 The leisure element within The Hub will also be open throughout the day and provide a further source of revenue for the development. It has the potential to take a number of forms including a visitor attraction and leisure activities for various groups.
- 2.21 The Festival Hall will be a large-scale flexible event and exhibition space. In addition to the main arena auditorium, there is growing demand by event organisers for immediately adjacent flexible space where the wider activities associated with an event can take place. This may be before or after show events or to provide the ability for events to take place across different areas in the same complex at the same time. It will comprises a 5,800sq m event hall with a further 800sq m of 'back of house' space and 3,400sq m of flexible space. This will again help with securing the attractiveness of the core arena use and provide a further opportunity for an income stream to support the overall viability of the development.

---

<sup>5</sup> The retail uses will primarily sell non-food goods and be associated with merchandising in connection with arena events rather than day to day shopping facilities for the local community

2.22 Top sporting events, award show dinners, large-scale events may require use of the Festival Hall in conjunction with the Arena. The two combined spaces are essential to support activities and drive the market for the events coming to Bristol. The flexibility of space allows the development proposal to attract a broader market, increasing the number of events per year and ensuring a full programme. The addition of the third space – the Hub – is essential to secure the 365 day a year business that will encourage increased footfall, in turn driving increased food and drink sales and ensuring a sustainable business.

| <b>YTL Arena Complex</b>        |                   | <b>Arena + Festival Hall</b> | <b>Arena Complex</b> |
|---------------------------------|-------------------|------------------------------|----------------------|
|                                 | <b>Arena Only</b> |                              |                      |
| <b>Arena Event Days</b>         | 110               | 130                          | 140                  |
| Total Visitors                  | 1,061,500         | 1,332,500                    | 1,435,000            |
| <b>Festival Hall Event Days</b> |                   | 94                           | 94                   |
| Total Visitors                  |                   | 150,200                      | 150,200              |
| Total Events                    |                   | 224                          | 234                  |
| <b>The Hub Operational Days</b> |                   |                              | 365                  |
| Total Visitors                  |                   |                              | 150,000              |
| <b>TOTALS</b>                   |                   |                              |                      |
| # Days in operation             | 110               | 224                          | 365                  |
| % Occupancy                     | 30                | 61                           | 100                  |
| # Visitors                      | 1,061,500         | 1,482,700                    | 1,735,200            |

2.23 As the above demonstrates, the YTL Arena Complex will host double the number of events of a stand-alone arena and will be a 364 day (pa) venue. It will also attract around 700,000 more visitors than a stand-alone arena and all three elements together (arena, festival hall and the hub) will deliver four times higher revenue on food and beverage sales than a stand-alone arena.

2.24 This is characteristic of other large arenas in the UK. In the past few years Glasgow, Aberdeen, Liverpool and Birmingham have all added event space to create an events complex with a variety of options:

- the Scottish Event Campus in Glasgow, features five interconnected exhibition and meeting spaces, the 3,000 seat SEC Armadillo and The SSE Hydro – a 13,500 capacity concert, sporting and special events arena;
- M&S Bank Arena Liverpool has a 11,000 capacity, with the Auditorium offering an additional 1,350. In 2015, the opening of sister venue Exhibition Centre Liverpool resulted in a broader offer for standing concerts and international sporting events. This venue features 'Space by M&S Bank Arena', a flexible entertainment space for up to 7,000 standing capacity.
- Aberdeen AECC was redeveloped in 2019 to increase the arena capacity from 10,000 to 15,000. Three 2,000sq m exhibition halls, 11 meeting rooms, 150 seat restaurants were also added.

- 2.25 The West of England currently does not have a venue to hold large scale events and exhibitions. The Festival Hall will do this as a standalone venue. In addition, it will support the Arena in attracting events that require extra space such as award shows and major sporting events. With the flexibility of three spaces, being interlinked but also independent, YTL Arena Complex will be able to attract shows such as BBC Sports Personality of the Year, international trade conventions, indoor athletics and gymnastics, and other sporting and family entertainment events not previously hosted in the city. There is a sizeable market opportunity for Bristol as 45% of all UK trade exhibitions and 38% of UK consumer exhibitions now require up to 5,000m<sup>2</sup> (source: Events Industry Alliance data) which Festival Hall can provide as a standalone venue. In its entirety YTL Arena Complex will be well positioned to attract a diverse and exciting programme of events putting Bristol on the world stage.
- 2.26 To illustrate how Bristol lags behind other core cities, in 2016 the core cities were ranked in the following order in terms of international success.
1. Glasgow - Scottish Event Complex, including SSE Hydro Arena
  2. Manchester - Manchester Arena, GMEX,
  3. Birmingham - Genting Arena, Birmingham Arena, NEC
  4. Liverpool - ACC, Liverpool Event Campus, including M&S Bank Arena
  5. Leeds - First Direct Arena
  6. Cardiff - Motorpoint Arena, ICC Newport
  7. Sheffield - FlyDSA Arena, Sheffield City Hall
  8. Nottingham - Motorpoint Arena, Albert Hall Conference Centre
  9. Bristol - UWE, Colston Hall
  10. Newcastle - Metroradio Arena, Gateshead proposed event complex
- 2.27 This demonstrates that Bristol's success as an international events destination has consistently been amongst the lowest of the Core Cities Group, in large part due to the absence of an appropriate events complex.
- 2.28 YTL's experience of liaising with organisations promoting Bristol (such as Destination Bristol) indicates that the Festival Hall would provide a very unique and desirable offer for the South West. For example, Bristol receives inquiries for big gaming events and exhibitions where they need a large open space which Bristol currently cannot offer. There are also enquiries for venues for one-off performances that have tiered theatre style seating which Bristol's theatres can rarely accommodate.
- 2.29 In addition to this, Destination Bristol reports that the city regularly has an opportunity to bid for large industry events, that bring people with potential business from all over the world to the city for 2+ days. An example of this is Meet GB for business events and Explore GB for travel trade/leisure groups. At present there is nowhere suitable to accommodate these events.

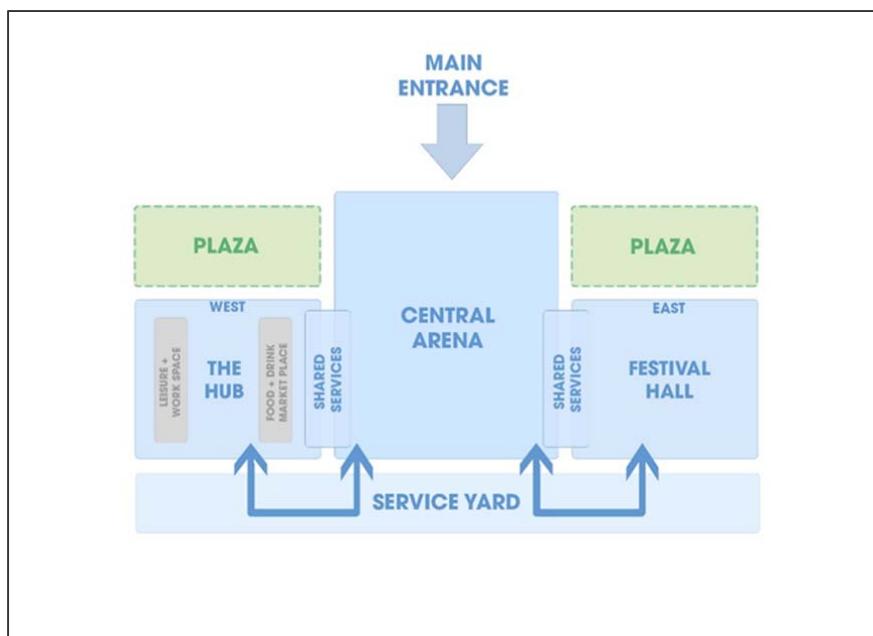
*Financial relationship*

- 2.30 Equally as important to the sustainable long term success of the proposed development is its financial characteristics. As noted in the introductory part of this section, the previous unsuccessful arena project in Bristol city centre was confirmed by BCC to be an unviable proposition without public sector support. Therefore, in the absence of public sector support, the arena proposal at the Brabazon Hangar must adopt an alternative approach in order to make the private sector arena a viable and sustainable proposition.
- 2.31 The development and operation of a large-scale arena requires a considerable financial investment. As a consequence, it is critical to both the operating success and for the investment model that the Brabazon Hangar development returns are maximised by reducing the financing term required to pay back the initial investment.
- 2.32 YTL's experience indicates that arena's on their own will only achieve a 30-35% annual occupancy impacting on operating profits. This is supported by the content of the (now abandoned) Temple Island arena outline business case (November 2013) prepared by Davis Langdon and IPW, which states that the operators approached for that project indicated the events potential for Bristol ranged from 80-130. This was supported by the forecasts for the eventual Temple Island 12,000-capacity, arena only scheme of 116 per annum events returning a 30% occupancy.
- 2.33 However, by expanding the facilities at the YTL Arena Complex, to include The Hub and the Festival Hall, and utilising a central operating services model, profits at the development can be maximised and higher occupancy rates can be achieved. This in turn will reduce the term required to pay back the initial investment to an acceptable level. The full YTL Arena Complex will increase events to 234 which is equivalent to a 64% annual occupancy.
- 2.34 To clearly illustrate this issue and demonstrate why The Hub and Festival Hall are required in order to make a commercial viable development, YTL has prepared a viability assessment and this is contained at Appendix XIII to this document. The assessment presents three scenarios:
- Scenario 1: the arena only (in the central hangar)
  - Scenario 2: the arena (in the central hangar) plus the festival hall in the east hangar
  - Scenario 3: the arena (in the central hangar) plus the festival hall in the east hangar and The Hub in the west hangar.
- 2.35 The assessment at Appendix IX is structured to show the development costs for each scenario and also the revenue for each scenario (including delivery and operating costs associated with each element). The assessment indicates that the arena on its own will generate only a 2% return on investment. Such a scenario would be unable to attract financial support as it is far too low to be considered to be a viable proposition for YTL or an alternative investor. However, by introducing the Festival hall and The Hub the level of return materially increases. Inclusion of the festival hall adds additional revenue to the project and brings the expected rate of return up to 5% which is a slight improvement but remains below the level of return which a commercial investor would require for an investment of this risk (see below for further information). However, with the inclusion of The Hub, the rate of return rises to 9.5% which would break the threshold for an acceptable return and thus proving why all three elements are required in order to provide a financially

viable project and, as a consequence, why all three elements need to be included in the assessment of alternatives.

2.36 In order to offer the best opportunity for a sustainable and viable arena project for Bristol in the long term it is therefore clear from the analysis presented in this document that the re-use of both the east and west hangars is essential. Re-use of both of the east and west hangars present the best opportunity to minimise risk to the project and attract investor confidence and, as a consequence, it is clear that the whole of the proposed development, in each of the three hangars, must be seen as a single package. A key aspect of ensuring a robust business case is providing the efficiencies which come from operating 234 events per annum (which can only be achieved via the use of the three hangars) rather than just 110 events (which would be reflective of an arena on its own). These efficiencies comprise:

- Better employment options, including permanent jobs
- More efficient and permanent use of internal equipment
- Shared efficient practices across each of the three buildings
- Shared services (security, facility management, catering and administration)



2.37 This is not just YTL's view but is also shared by BCC's own advisers. When considering 'value for money' issues associated with the abandoned Temple Island proposal, KPMG noted<sup>6</sup> that:

*"After taking into account the BCC and LEP funding contributions that do not require repayment, the Arena will make a positive financial return, before financing costs, of 2.82% nominal over 25 years in nominal terms.*

**This level of nominal financial return is lower than our estimate of what a commercial investor would require for an investment of this risk** (KPMG use a proxy estimate of 6.20%) and below the HM Treasury Green Book threshold for public sector investment appraisal of 5.57% (3.50% real rate adjusted for BCC's 2.00% inflation assumption). Before any public sector funding contributions the Arena is estimated to

<sup>6</sup> Temple Island Arena: Value for Money Assessment, KPMG for BCC, June 2018

*deliver a financial return of -0.67% over 25 years. This willingness to invest at a sub-commercial return represents direct financial support". [our emphasis]*

- 2.38 In summary, the YTL Arena Complex is an entirely privately funded project. It requires no public subsidy and the above analysis has demonstrated why the re-use of the three hangars is required to provide a financially sustainable and viable business model.

### *Conclusion*

- 2.39 As a consequence of the above, it is clear that a successful arena use is not just an auditorium for concerts. An arena is a collection of inter-related uses which support the functionality, attractiveness and viability of a destination which can host large scale concerts and events. This must therefore be the starting point for the assessment of alternative sites and premises in the sequential test – i.e. the ability to accommodate a broadly similar type and amount of uses as outlined in paragraphs 2.2 to 2.4 above. This would comply with the correct approach of the sequential test as set out in, for example, the Secretary of State's decision<sup>7</sup> on The Mall extension at Cribbs Causeway (see Section 3 of this document for further details about this decision).

---

<sup>7</sup> APP/P0119/V/17/3170627

### 3. The Approach to the Sequential Test and the Assessment of Alternatives

#### Introduction

3.1 In order to ensure that the assessment of alternative sites and premises is undertaken properly and on a robust basis, it will be important to understand the approach which the applicant has applied to the following:

- The interpretation of planning policy on the sequential test;
- The interpretation of salient case law and recent appeal / call-in decisions involving the application of the sequential test;
- The area of search for alternatives; and
- The approach to assessing the suitability and availability of alternatives, including an allowance for flexibility in scale and format.

3.2 We outline these factors in turn below.

#### Planning Policy

3.3 The Site subject to Application A covers land in the administrative area of BCC and is identified as a principal industrial and warehousing area in the current adopted development plan. It does not form part of a defined 'town centre' in Bristol's town centre hierarchy outlined in Policy BCS7 of the Bristol Core Strategy. The nearest defined 'town centres' are to the south-west (Crow Lane) and south (Southmead).

3.4 Within the SGC administrative area, the Site adjoins the Cribbs/Patchway New Neighbourhood which is identified for a mixture of land uses and functions within the Filton Airfield development area. The Airfield does not contain any defined new centres in the South Gloucestershire town centre hierarchy in the current development plan and the nearest defined 'town centres' are Patchway to the north (on the opposite side of the Airfield) and Filton to the south-east. It is of course quite possible that the new town centre at the Airfield site will, in due course, be added to the formal 'town centre' hierarchy in South Gloucestershire and at that stage the arena mixed use proposal will become an edge-of-centre or town centre location.

3.5 In order to operate the sequential test, sites must be classified as either in-centre, edge-of-centre or out-of-centre locations. The NPPF defines edge-of-centre locations as

*"For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances".*

3.6 Therefore, for retail uses, an in-centre location lies within a primary shopping area. For the leisure and workspace uses in this proposal, an in-centre location lies within a defined 'town centre' boundary<sup>8</sup>.

3.7 Out-of-centre locations are defined as:

*"A location which is not in or on the edge of a centre but not necessarily outside the urban area".*

3.8 The main part of the Brabazon Hangar site does not lie within 300 metres of any of the above defined town centre and/or primary shopping area boundaries and therefore, at the present time, and until such time as SGC re-examines its 'town centre' hierarchy, it should be classified as an out-of-centre location.

3.9 Given the classification of the application site, sequentially preferable locations will, with reference to the development plan and the NPPF, therefore be:

- In-centre sites;
- Edge-of-centre sites; and
- Out-of-centre sites which are more accessible and better connected to town centres.

3.10 The need for consideration of some alternative out-of-centre locations arises out of the contents of paragraph 87 of the 2019 NPPF which notes that:

*"When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre".*

3.11 Later in this section we explain, with reference to salient case law, how this particular aspect of paragraph 87 should be interpreted and assessed.

3.12 In light of the above, the assessment of the sequential test is required in terms of the following local and national policies:

- Policy DM7 of the Bristol Site Allocations and Development Management Policies Plan. This policy outlines the approach to assessing retail and other main town centre land use proposals outside of defined town centres.
- Policy BCS7 of the Bristol Core Strategy. The policy sets the strategic context for 'town centres' across Bristol and outlines the 'town centre' hierarchy.
- Paragraphs 86 and 87 of the 2019 NPPF

---

<sup>8</sup> The Glossary to the 2018 NPPF defines a town centre as: "Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres".

## The Approach to Assessing the 'Suitability' and 'Availability' of Alternatives, including the Need for Flexibility

3.13 Paragraph 86 of the NPPF notes that:

*"Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered". [our emphasis]*

3.14 It is therefore clear that the two factors which sequential site assessments should focus upon are: are alternative sites and premises suitable and available for the proposal?

3.15 In relation to the assessment of 'suitability', the Planning Practice Guidance ('PPG') notes:

*"Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal".*

3.16 This is a clear reference to the need to demonstrate flexibility as required by paragraph 87 of the NPPF:

*"Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored".*

3.17 We consider that the extent of reasonable 'flexibility' should be considered on a case-by-case basis, depending upon the relevant circumstances to that proposal and the surrounding area. Some examples of how 'flexibility' should be applied are set out in the next sub-section.

3.18 In relation to the issue of 'availability' the 2019 version of the NPPF has helpfully clarified that consideration should be given to a particular site's availability within a 'reasonable period of time'. There is no supporting guidance to explain what a 'reasonable period' is and we consider that what is 'reasonable' will also need to be judged on a case-by-case basis depending upon the relevant particular circumstances. We do not consider that it should be interpreted as restricting the assessment to only sites and premises which are vacant/being marketed at the time of undertaking the assessment.

3.19 The case law sub-section below provides some examples of how this has been applied recently.

### Salient Case Law and Appeal / Call-In Decisions

3.20 Court judgements and appeal / call-in decisions from Inspectors and the Secretary of State can be helpful in interpreting the content of national planning policy and also the correct approach to the application of planning policies. The most notable cases, in our opinion, are:

- The *Tesco v Dundee* Supreme Court judgement<sup>9</sup>;
- The Secretary of State's decision at Rushden Lakes<sup>10</sup>;

---

<sup>9</sup> [2012] UKSC 13

<sup>10</sup> APP/G2815/V/12/2190175

- The *Aldergate v Mansfield* High Court judgement<sup>11</sup>;
  - *Telford & Wrekin and St Modwen v Secretary of State for Communities and Local Government* High Court judgement<sup>12</sup>;
  - The Secretary of State's decision<sup>13</sup> in relation to a retail and leisure proposal on Honiton Road in Exeter; and
  - The Secretary of State's recent decision in relation to the proposed extension to The Mall at Cribbs Causeway.
- 3.21 In looking at the issue of 'flexibility' in the sequential test, we consider that a useful starting point is the Supreme Court decision in *Tesco v Dundee City Council*. The Supreme Court was being asked to consider what was meant by 'suitable' in the Scottish version of the sequential test. The choice as put to the Supreme Court was between "*suitable for meeting identified deficiencies in retail provision in the area*" and "*suitable for the development proposed by the applicant*".<sup>14</sup> The Supreme Court said (in the main speech given by Lord Reed) that the latter was correct, "*subject to a qualification*".
- 3.22 That qualification was explained by Lord Reed in paragraphs 28 and 29 of the judgement:

*"28. I said earlier that it was necessary to qualify the statement that the Director and the respondents proceeded, and were correct to proceed, on the basis that "suitable" meant "suitable for the development proposed by the applicant". As paragraph 13 of NPPG 8 makes clear, the application of the sequential approach requires flexibility and realism from developers and retailers as well as planning authorities. The need for flexibility and realism reflects an inbuilt difficulty about the sequential approach. On the one hand, the policy could be defeated by developers' and retailers' taking an inflexible approach to their requirements. On the other hand, as Sedley J remarked in *R v Teesside Development Corporation, Ex p William Morrison Supermarket plc and Redcar and Cleveland BC [1998] JPL 23*, 43, to refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer. The guidance seeks to address this problem. It advises that developers and retailers should have regard to the circumstances of the particular town centre when preparing their proposals, as regards the format, design and scale of the development. As part of such an approach, they are expected to consider the scope for accommodating the proposed development in a different built form, and where appropriate adjusting or sub-dividing large proposals, in order that their scale may fit better with existing development in the town centre. The guidance also advises that planning authorities should be responsive to the needs of retailers. Where development proposals in out-of-centre locations fall outside the development plan framework, developers are expected to demonstrate that town centre and edge-of-centre options have been thoroughly assessed. That advice is not repeated in the structure plan or the local plan, but the same approach must be implicit: otherwise, the policies would in practice be inoperable.*

*29. It follows from the foregoing that it would be an over-simplification to say that the characteristics of the proposed development, such as its scale, are necessarily definitive for the purposes of the sequential test. That statement has to be qualified to the extent that the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for*

---

<sup>11</sup> CO/6256/2015

<sup>12</sup> CO/9668/2012

<sup>13</sup> APP/Y1110/W/15/3005333

<sup>14</sup> Paragraph 24

*accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains, as Lord Glennie observed in Lidl UK GmbH v Scottish Ministers [2006] CSOH 165 , para 14, whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site."*

- 3.23 The Supreme Court then explained (in paragraph 30) that the requisite flexibility had been shown in that case because the developers:

*"did not confine their assessment to sites which could accommodate the development in the precise form in which it had been designed, but examined sites which could accommodate a smaller development and a more restricted range of retailing".*

- 3.24 Proper consideration requires an assessment of whether, if flexibility is shown with regard to scale and format, the proposal can be accommodated on the sequentially preferable site in question, whether or not it is smaller than the site promoted by the applicant, which (by definition) will be a less sequentially preferable site.
- 3.25 The reference to the 'real world', which came in the supporting judgment<sup>15</sup> from Lord Hope in Tesco v Dundee was itself qualified by the clear recognition (at paragraph 38) that *"If they do not meet the sequential approach criteria, bearing in mind the need for flexibility and realism to which Lord Reed refers in para 28, above, they will be rejected."*
- 3.26 Tesco v Dundee is therefore very clear that a developer's proposal can only be used to set the parameters for "suitable" sites if that proposal properly demonstrates flexibility in its formulation (having regard, of course, to the "real world" in which all retailers operate).
- 3.27 Following the Dundee judgement, the Secretary of State's decision at Rushden Lakes is often quoted in relation to the application of the sequential test. It should be noted that there have been a number of subsequent decisions from the Secretary of State on retail and leisure proposals across the country which give more recent applications of the sequential test, although it is nevertheless still useful to outline the key parts of the Rushden Lakes decision.
- 3.28 The Rushden Lakes proposal comprised a large-scale mixed use scheme including a significant amount of non-food floorspace and other main town centre uses in a number of separate units/plots. In this respect, the Rushden Lakes proposal is materially different to this proposal.
- 3.29 In order to understand the lack of relevance of the Rushden Lakes decision and how it can be applied in the context of this proposal, it is useful in our opinion to make reference to part of the Inspector's

---

<sup>15</sup> *"I do not think that this is in the least surprising, as developments of this kind are generated by the developer's assessment of the market that he seeks to serve. If they do not meet the sequential approach criteria, bearing in mind the need for flexibility and realism to which Lord Reed refers in para 28, above, they will be rejected. But these criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so".*

recommendations and the Secretary of State's decision letter. When dealing with the issue of 'suitability', the Inspector noted<sup>16</sup>:

*"It is, of course, correct that the meaning of the term should be construed in its context. That involves consideration of the question of "flexibility" which is referred to in the last sentence of NPPF [24]. However, that the terms are to be construed (and therefore applied) in the real world of real development is beyond argument. The real world is the context".*

- 3.30 With reference to the Dundee judgement, the Inspector noted that<sup>17</sup>:

*In summary it establishes [a] that if a site is not suitable for the commercial requirements of the developer in question then it is not a suitable site for the purposes of the sequential approach; and [b] that in terms of the size of the alternative site, provided that the Applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site. These points although related are distinct. [our emphasis]*

- 3.31 The Inspector then went on to discuss how flexibility could be applied and the continued relevance of the Practice Guidance<sup>18</sup>:

*"The NPPF requires developers to demonstrate flexibility on issues such as format and scale. No indication as to what degree of flexibility is required is contained in the NPPF. Such a requirement was previously contained in PPS4 and so any relevant PG advice continues to be material. PPS4 PG is of assistance: flexibility in a business model, use of multi level stores, flexible car parking requirements or arrangements, innovative servicing solutions and a willingness to depart from standard formats".*

- 3.32 Having regard to the Inspector's recommendations, the Secretary of State's decision reached the following conclusion:

*"15. The Secretary of State agrees with the Inspector that the application site is out of centre and that the sequential test would be satisfied if "suitable [in or edge of centre] sites are not available", albeit that that involves consideration of the question of "flexibility" (IR8.43). Furthermore, having regard to the arguments put forward by the Inspector at IR8.44-8.48, the Secretary of State agrees with his conclusion at IR8.48 that the sequential test relates entirely to the application proposal and whether it can be accommodated on an actual alternative site (e.g. a town centre site). The Secretary of State agrees with the Inspector's conclusions on the sequential test in IR8.48. He notes that the Framework requires developers to demonstrate flexibility on issues such as format and scale (IR8.49); and that the new Planning Guidance asks decision makers to consider whether there is scope for flexibility in the format and/or scale of a proposal, making it clear that it is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*

*16. Having regard to this, and for the reasons in IR8.50, the Secretary of State agrees with the Inspector that the applicant has demonstrated flexibility on format and scale and that the whole scheme could not realistically be moved to another location". [our emphasis]*

---

<sup>16</sup> Paragraph 8.43

<sup>17</sup> Paragraph 8.45

<sup>18</sup> Paragraph 8.49

- 3.33 It is clear from the Inspector's and Secretary of State's reasoning in Rushden that the issue of 'flexibility' is a central theme for the sequential test. In that case they felt that sufficient flexibility for that proposal had been achieved and the Secretary of State took account of the multi-level format and reduction in retail space. The Inspector also confirmed that the 2009 Practice Guidance was still a material consideration (at the time of his report). Paragraph 6.27 of the Practice Guidance confirms that the issue of flexibility is also in relation to the consideration of alternative sites. In other words, it is not just the scale and format of the proposal at the application/appeal site.
- 3.34 It is also clear from the Rushden Lakes decision that 'format' and 'scale' are central to the issue of flexibility. 'Scale', relating to the size of the proposal, with 'format' relating to matters such as multi levels, configuration and non-company standard characteristics. It is to be noted that the Secretary of State was careful not to adopt in every respect all of the Inspector's comments (which he described unusually as 'arguments') and that he specifically emphasised that flexibility has to be demonstrated and that there is no requirement for a sequentially preferable site *"to accommodate precisely the scale and form of development being proposed"*<sup>19</sup>.
- 3.35 In addition to Dundee and Rushden Lakes, we consider that the judgement of Ouseley J in relation to *Aldergate Properties Ltd v Mansfield District Council*<sup>20</sup> is relevant. That case concerned a proposed out of centre foodstore in Mansfield which was intended to be occupied by ALDI. ALDI already had a store in Mansfield and, on this basis the applicant and the local planning authority decided that the area of search for sequentially preferable alternatives should be modified to exclude the catchment of the existing ALDI store. In other words, the application of the sequential test was influenced by the business needs/requirements of ALDI.
- 3.36 In finding that approach to be incorrect, Ouseley J noted:

*"35. I have no doubt but that Mr Kolinsky's essential argument is correct, for a variety of reasons. In my judgment, "suitable" and "available" generally mean "suitable" and "available" for the broad type of development which is proposed in the application by approximate size, type, and range of goods. This incorporates the requirement for flexibility in [24] NPPF, and excludes, generally, the identity and personal or corporate attitudes of an individual retailer. The area and sites covered by the sequential test search should not vary from applicant to applicant according to their identity, but from application to application based on their content. Nothing in *Tesco v Dundee City Council*, properly understood, holds that the application of the sequential test depends on the individual corporate personality of the applicant or intended operator".*

and

*"37 Second, and related, NPPF [24] positively "requires" retail investment in the first place to locate in town centres rather than elsewhere. Its thrust is rather more emphatic than policies which advise developers and retailers to have regard to the circumstances of town centres, as in *Tesco v Dundee* [28]. It is the purpose of the planning system to control development that is to permit, prevent, encourage, inhibit or limit and condition it, so that the individual private or commercial interest and the broader public interest meet in reconciliation however uneasily. NPPF [24] cannot therefore be interpreted as requiring "suitability" and "availability" simply to be judged from the retailer's or developer's perspective, with a degree of flexibility from the retailer, and responsiveness from the authority.*

*38 Third, and of critical importance here, still less can it be interpreted as envisaging that the requirement or preferences of an individual retailer's trading style, commercial attitudes, site preferences, competitive preferences whether against itself or greater competition should dictate what*

<sup>19</sup> Paragraph 15 of Secretary of State's decision letter

<sup>20</sup> [2016] EWHC 1670 (Admin)

sites are "suitable" or "available" subject only to a degree of flexibility. NPPF [23] and [24] are simply not couched in terms of an individual retailer's corporate requirements or limitations. That would be the antithesis of planning for land uses and here, its default policies. It would take very clear language for such an odd result to be achieved.

39 Any alternative approach would reduce the sequential test to one of the individual operator's preference, with the suitability of centres, sites and their availability varying from applicant to applicant each proposing the same broad type or even identical form of development. This case illustrates just why on the proper interpretation of NPPF [24], the identity of the applicant or proposed occupier is generally irrelevant. Even if the applicant had been Aldi, or if the application had been for a store to be occupied by Aldi, with an occupancy condition envisaged from the outset, the town centre would have been wrongly excluded from the search area on the basis of Aldi's particular corporate, commercial position or style. Any other approach would make nonsense of the sequential test to the advantage of an operator well-represented in the area, or one reluctant to compete with certain other retailers, however sensible that reluctance might be commercially. The applicant may not be a retailer; it may or may not have an operator identified, or one may be signed up or interested but the identity of which it is not yet willing to disclose. It would have to go through the full sequential test, and then obtain its retailer; but were the application made with retailer in tow, the test would be different. And were a retailer later signed up, it could require a different sequential test for the same application or a repeated application for the same development at the same site. That is not the intention of NPPF [24] or any sensible application of the sequential test".

- 3.37 The judgement also dealt with the issue of availability at paragraph 42:

"Fourth, there is a further reason why the identity of the applicant, as opposed to the sort of development it proposes, is not generally relevant to the sequential test. The sequential test in the NPPF is not just one of suitability; it covers availability: "only if suitable sites are not available, should out of centre sites be considered." A town centre site may be owned by a retailer already, to use itself for retailing, who is not going to make it available to another retailer. It is plainly available for retailing, though only to one retailer. That does not mean that another retailer can thus satisfy the sequential test and so go straight to sites outside the town centre. "Available" cannot mean available to a particular retailer but must mean available for the type of retail use for which permission is sought".

- 3.38 A recent Secretary of State decision at Honiton Road in Exeter<sup>21</sup> has also discussed the issue of availability when considering the sequential test. In that case, the appellant proposing a large out of centre retail and leisure park argued that a sequentially preferable location in Exeter city centre was not available for the purposes of the sequential test as it was not available to the appellant. However, the Inspector, in his report to the Secretary of State noted:

"11.38 The NPPF and the PPG both refer to availability with regard to the sequential test but neither clarifies how this should be defined. The appellant argued that the BCS is not available since CEH and the Council have agreed on a way forward and are unlikely to allow other developers a look in. The purpose of retail policy in NPPF 23 is to promote competitive town centre environments and manage the growth of centres. The NPPF test should not be used to prevent development unless a sequentially preferable site could actually deliver the proposals. [6.32-33, 7.16, 8.20]

11.39 However, there is no sound basis for finding that the BCS site is not available to traders and no rationale for concluding that the site must be on the open market to any developer. Providing PHL goes ahead, the new retail floorspace would be marketed to traders who would occupy it regardless of who developed or owned the scheme. The need for flexibility in the Judgment in *Tesco v Dundee* refers to retailers as well as developers and this strengthens the conclusion that available means for the development proposed not for the landowner hoping to carry out the development. Although on the separate point of specific locational requirements, the PPG does state that land ownership does not provide a justification for excluding a site. [6.32, 7.16, 8.19]

11.40 In the absence of any clearer interpretation, the preference in NPPF 24 should refer to availability to traders. It follows that it doesn't matter who develops the site so long as it can provide the proposed

<sup>21</sup> LPA SoC Appendix 21

*level of shop floorspace. As above, the requirement for a bus station and a leisure outlet on another part of the BCS site does not mean that the area earmarked for retail development is not available. On this point as well, the BCS would be sequentially preferable".*

- 3.39 The Secretary of State agreed with the Inspector's recommendations, noting:

*"For the reasons set out at IR11.30-11.37, the Secretary of State agrees with the Inspector that given no more than reasonable flexibility, the Bus and Coach Station site would be suitable for the town centre uses proposed for the appeal site (IR11.37). The Secretary of State has taken into account the Inspector's reasoning at IR11.38-11.40. He agrees that there is no rationale for concluding that the site must be on the open market to any developer, and that the new retail floorspace would be marketed to traders who would occupy it regardless of who developed or owned the scheme (IR11.39). He further agrees that the requirement for a bus station and a leisure outlet on another part of the Bus and Coach Station site does not mean that the area earmarked for retail development is not available (IR40). Overall he considers that the Bus and Coach Station site is available".*

- 3.40 The *Telford* judgement is relevant to the application of the sequential test in relation to the consideration of edge or out-of-centre sites which may have the same status as the application site. The *Telford* case concerned a supermarket proposal on land Audley Avenue in Newport, Shropshire, considered at appeal. There was a rival potential supermarket development site on Station Road in Newport and a key issue for the Inspector was to consider whether one site was sequentially preferable to the other one. Based sites were considered to lie in out-of-centre locations. In a legal challenge subject to the appeal being decided, Turner J had to consider a number of issues including whether the application of the sequential test can give rise to no clear winner. Turner J found that:

*"28. In my judgment, it is, indeed, open to a decision maker to find that one or more sites are sequentially equal".*

and

*"31. Thirdly, there may well arise circumstances in which it would be wholly artificial for the decision maker to be compelled to declare one site to be the sequential victor. Sequential superiority is not to be determined merely by measuring which of two competing sites is closer to the town centre as the crow flies. There will be situations arising in which one proposed site is geographically closer than another but where access is more limited by features such as steep gradients or limitations on the categories of traffic which can make use of such access. It takes no effort of the imagination to conceive of many permutations of factors which would justify a finding that one site is not discernibly sequentially superior to another. In such cases, the Inspector should not be expected to draw fine and potentially specious distinctions simply for the purpose of avoiding a "draw". On this basis, I am not satisfied that the use of the word "preference" in the Framework mandates the making of a stark choice between two or more options".*

- 3.41 Whilst this judgement and the preceding appeal decision were published in the context of the 2012 version of the NPPF, the wording on this part of the application of the sequential test has not changed in the 2019 version. Therefore, when applying the sequential test in the context of this particular proposal at the Site it will be important to understand, using the principles of the *Telford* judgement, whether other alternative out-of-centre sites being assessed are either (A) sequentially equal to the application site, or (B) sequentially preferable, or (C) sequentially inferior.
- 3.42 Finally, whilst not necessarily introducing any new aspects of how the sequential test should be applied, and containing a considerably different land use mix to the Brabazon Hangar scheme, the Secretary of State's

decision on The Mall extension proposals at Cribbs Causeway should be noted and summarised. In particular, this is due to this decision being the first decision by the Secretary of State since the publication of the new NPPF in 2019.

3.43 BCC and SGC will be very familiar with the content of The Mall extension proposal, including the focus for the sequential test and the potential alternative site at Callowhill Court in Bristol city centre. In summary, the Inspector's report and the Secretary of State's decision indicated the following in relation to the sequential test:

- The Inspector's report indicated that for the Callowhill Court site to be suitable it needed to accommodate the relevant parts of a broadly similar development proposal. Paragraph 20 of the Secretary of State's decision letter agreed with this approach and paragraph 27 indicates that it was a suitable alternative as it could accommodate a broadly similar quantum of retail and leisure uses.
- The Callowhill Court would be available mid to late 2021 and the Secretary of State found this to be consistent with paragraph 86 of the NPPF regarding sites being expected to become available within a reasonable period.

### **The Area of Search for Alternatives**

3.44 When searching for potential alternative sites to assess as part of the sequential test, it is well established best practice to focus upon (A) the catchment area of the proposal, and (B) the most appropriate 'town centres' within this area in relation to the nature and function of the proposed development. There is no current national guidance on this issue although this 'best practice' was set out in the former Practice Guidance on Need, Impact and the Sequential Approach prepared to support PPS4.

3.45 The nature of the proposed development, particularly the core arena function, means that it will have a wide catchment across the West of England and the South West of England and South East Wales. This area will therefore cover many 'town centres' although there is a need to consider which of these centres, and which geographic area, should be the focus for the assessment of alternatives.

3.46 The proposed use is intended to attract a large number of visitors and therefore it should be located in an area which (A) has a large local resident population, and (B) can accommodate a large number of visitors via its transportation infrastructure. As a consequence, the only realistic and sensible area of search for this particular proposal is the West of England area and in particular the Bristol and Bath urban areas. This will also be where the bulk of visitors to the proposal will reside and as a consequence it would simply not be logical to try and place the proposal in an alternative settlement which contributes a materially lower proportion of visitors. Other settlements such as Gloucester simply do not have the scale of local resident population to support an arena facility and, in the case of Gloucester, has an over-lapping catchment with other large scale venues in Birmingham. Therefore, in reality, and in the real world, the West of England, and primarily Bristol, is the only settlement which can accommodate the visitor numbers associated with a major arena.

3.47 There are also the commercial realities to consider. It is very likely that each region of the UK has the commercial and functional capacity for only one major arena. As noted above, there is a clear deficiency

in Bristol (being a core city), and the YTL intends to fill that deficiency/gap with the proposal at the Brabazon hangar site. Whilst the proposal will have a wide catchment, search for alternatives in say South East / South Wales or the northern parts of Gloucester and into Worcestershire would place the proposal too close to existing facilities in Cardiff and Birmingham, leading to significantly overlapping catchments and viability concerns as the arena facilities compete for the same events. There is also the need to ensure that the arena proposal is placed in a location which gives it the best chance of becoming a viable proposition and being able to attract the best entertainment events. Smaller alternative settlements across the South West of England simply do not have the necessary profile to attract the best entertainment events and therefore it would not be logical to search for alternative locations in such settlements.

### The Search for and Identification of Alternatives

- 3.48 Following the selection of the core area of search for alternatives<sup>22</sup>, our assessment can move forwards to the identification of alternative sites for assessment in terms of their suitability and availability to accommodate the proposal. In order to provide a robust assessment, AY and YTL have worked with BCC<sup>23</sup> and SGC to identify a ‘long list’ of alternative sites and premises and then reduce these down to a ‘short list’ of sites via an assessment of whether they may offer a reasonable alternative for the proposal based upon their characteristics.
- 3.49 The ‘long list’ of alternative sites across Bristol, South Gloucestershire, North Somerset and Bath is contained at Appendix XII to this document and has focused upon the following:
- We have re-assessed the sites considered as potential alternatives in the Environmental Statement accompanying the Temple Island Arena proposal in Bristol city centre.
  - We have also assessed all sites within the Bristol Temple Quarter Enterprise Zone Prospectus.
  - Apart from very small sites, we have assessed the major allocated sites in the Bristol Central Area Plan.
  - Apart from large sites close to Bristol city centre and South Bristol (i.e. Hengrove) we have not assessed allocated sites in the Bristol Site Allocations and Development Management Policies Plan as they are generally small scale and/or in residential areas which are clearly not well suited to large scale main town centre uses attracting a lot of visitors.
  - We have assessed large scale sites in South Gloucestershire’s North and East Fringe which are allocated in the Core Strategy or Site Allocations Plan, plus the area covered by the Cribbs Patchway New Neighbourhood Supplementary Planning Document.
  - Whilst Bath city centre is not the main focus for the search for alternatives, we have assessed major allocated sites in or adjacent to the city centre in the adopted B&NES Placemaking Plan. Similarly, whilst there are good reasons for dismissing Weston-super-Mare as an unrealistic alternative<sup>24</sup>, we have also included a selection of the major redevelopment sites in the town as part of our long list of alternatives.
  - We have also assessed areas proposed to be allocated for development in the West of England Joint Spatial Plan.

<sup>22</sup> Centred on the administrative areas of Bristol, B&NES, South Gloucestershire and North Somerset

<sup>23</sup> BCC has also sought contributions from North Somerset Council in relation to potential sites in Weston-super-Mare

<sup>24</sup> Weston, whilst a popular tourist destination, will not be able to provide the critical mass of population to support the arena function and also has inferior transport infrastructure to the Bristol area.

3.50 It is clear that, following initial assessment, a large number of sites included in the long list can be discounted for detailed assessment in the short list. We have therefore marked up each site in the long list according to the potential of each site to be either dismissed at this stage or taken forward to the short list on the following basis:

- GREEN: site should be dismissed from the 'long list' as not being suitable<sup>25</sup>
- AMBER: site unlikely to be suitable and available although such sites require an additional area of analysis to ensure that they are dismissed on the correct basis
- RED: site will definitely be taken forward for further consideration in the 'short list'

3.51 This process has led to the following sites and premises being short-listed for detailed assessment:

- The former diesel depot at Temple Island in Bristol city centre;
- Newfoundland Way in Bristol city centre;
- The fruit wholesale market in St Philips, Bristol;
- Hengrove Park;
- The site of the planned University of the West of England stadium in Stoke Gifford;
- The Galleries shopping centre in Bristol city centre;
- Land adjacent to the Bristol City Football Club stadium at Ashton Gate;
- Redcliffe Village;
- Avonmeads Retail Park;
- Horsefair / Callowhill Court; and
- Union Street / Silver Street / All Saints Street.

### **The Approach to Assessing Suitability and Availability**

3.52 Having regard to the foregoing assessment, our approach to the assessment of the 'suitability' and 'availability' of alternative sites and premises is set out below.

3.53 However, before we do so, it will be important to describe the extent of flexibility in format and scale which has been employed by the applicant in assessing sequentially preferable alternative locations.

3.54 As a starting point, the Secretary of State's decision, supported by the report of Inspector Christina Downes, in relation to The Mall extension proposal in Bristol did not suggest that current central Government policy is to promote the disaggregation of main town centre land use proposals which contain 'separate' elements.

---

<sup>25</sup> Sites which are clearly too small and/or based upon a development plan allocation

As a consequence, significant weight can be given to the approach advocated by The Mall extension Inspector that

*"What would be reasonable and appropriate will depend on the particular circumstances of the sequential site and the proposals that it is being expected to accommodate".*

and that an alternative should be able:

*"to accommodate the relevant parts of a broadly similar development proposal".*

- 3.55 Alternative sites should therefore be expected to accommodate a proposal which is broadly similar to this proposal which has three inter-linked elements. We discuss the nature of each element below and how they are inter-linked (which is reinforced by the business case outlined in Section 2 of this document).
- 3.56 The integral part of the proposed development is the arena auditorium. The capacity and format of the auditorium is linked to its viability. YTL consider that in order to provide a viable private sector operated arena, the capacity must be able to accommodate 17,000 people in a combination of formats. This is because the arena complex must be viable in its own right (without public support) and venues with less than a 17,000 capacity will struggle to attract the best acts/performances which would thus affect viability. It is to be noted that the previous proposals for an arena on Temple Island in Bristol city centre had a capacity of 12,000 people. However, BCC confirmed that the Temple Island arena needed public support which is, of course, not an option in terms of the privately operated arena at the Brabazon Hangar site. Therefore, there would be no sensible logic in testing alternatives on the basis of a 12,000 capacity auditorium as it would not provide a viable and deliverable alternative and would not attract a sufficient variety of acts.
- 3.57 In addition, in order to ensure that a wide range of events can take place – i.e. concerts, sporting events and theatre-style events – different configurations are necessary (including 360-degree bowl, horseshoe and theatre-style formats). This has a significant influence on the ground floor footprint of the auditorium building and its overall scale.
- 3.58 In addition to the auditorium itself, there is a need for supporting facilities to ensure that (A) events can operate successfully and efficiently, (B) the venue is attractive to visitors across the various different types of events, and (C) these facilities can generate income to contribute to overall viability. Therefore, the main auditorium building must be able to accommodate: a sufficiently large general concourse, food and drink facilities, hospitality and premium facilities (including a minimum of 2,000 seats and an equivalent number of hospitality boxes/areas), and sufficiently large back of house facilities. In order to attract artists, performers and productions who typically visit a 17,000 capacity venue there has to be sufficient adjacent servicing arrangements for a number of HGVs. Based upon experience from other large arenas, this is typically 30 large vehicles per event (mainly HGVs and coaches) and translates to a servicing area of 0.66 hectares.
- 3.59 The Festival hall has two key characteristics which cannot be materially altered or amended. First, it has to be able to provide a large ground floor area to accommodate a large number of people and/or equipment/exhibits for either concerts, exhibitions or other events. This space must also be at ground floor level given the nature of the use and the need for adequate servicing. Second, the Festival hall needs to be adjacent and physically connected to the arena auditorium building as there will be many events which share and require both spaces. For example, awards ceremonies held in the main arena auditorium require

adjacent large spaces for before show and/or after show parties. In addition, sporting events held in the main arena auditorium (such as athletics events) require warm-up areas. If these two spaces are separated, or on different sites, the operating viability of the proposal will be (A) damaged as it would be able to hold a series of events which will contribute to the viability of the development, and (B) will not be broadly similar to the form of proposal at the Brabazon Hangar site. YTL does recognise that some of the supporting 'flexible' space in the Festival hall element has some flexibility and this could be provided at say first floor level.

3.60 The final integral element of the proposal is The Hub. This is intended to provide for employment, retail, leisure and possible non-residential institution (D1) uses. It is recognised that there could be some flexibility in this element in order to provide a multi-level style of development in order to accommodate the proposed 18,450sq m of floorspace. However, the land uses in this element are integral to the content of the proposal and its overall viability. As noted earlier in this document, the retail and leisure space is vital to support the operation of the arena auditorium whilst there are many functional relationships between employment workspace and education space in The Hub and the adjacent main arena auditorium. There are two important linkages here. First, financial viability. As explained in Section 2 of this document, in order to make a reasonable rate of return on an investment, the various land uses in the Hub provide vital rental income for the project and therefore are necessarily an integral part of the development. Second, functional linkages. The central hangar contains the main arena auditorium and whilst it provides hospitality areas it cannot provide sufficient food and beverage uses to serve all those people attending events in the arena.

3.61 Taking into account the above, the approach adopted to assessing the suitability and availability of alternatives is as follows:

- **Suitability**

- Taking into account paragraph 87 of the NPPF, recent case law and Secretary of State decisions and the NPPG, alternative sites and premises must not just be tested on the basis of their ability to accommodate precisely the same form and scale of development proposed. Alternatives should be considered, including potentially different levels of floorspace and in different configurations. However, they must still be able to accommodate a broadly similar type of development.
- Therefore, alternatives must be able to accommodate the arena auditorium, The Hub and the Festival hall. They may be arranged in different configurations but they must be physically connected. The Festival hall must occupy a ground floor location due to the need for a column-free internal area and this element cannot be combined in a multi-level format with the other elements due to the need for a column-free environment, to avoid significantly prohibitive construction costs and to provide for adequate servicing.
- Whilst there is flexibility in format, particularly in relation to The Hub, alternatives must be able to accommodate a 17,000 auditorium in order to provide a privately run viable proposal. Alternatives must also be able to accommodate physically adjacent Festival hall of circa 5,800sq m event space.
- There can be flexibility in site area, up to be certain point. For example, whilst the area subject to this proposal is circa 13 hectares, alternatives need not be of this size as they may not need the same level of access arrangements from the public highway.

- In order to provide adequate servicing for large scale events, a service yard of 0.66 hectares is required.
  - There is flexibility in car parking provision. Whilst there is a definitive need for adjacent disabled car parking, there may be alternative locations which can utilise existing car parking capacity in the local area. The obvious example of this would be Bristol city centre. It should be noted that car parking provision is not included in the application site, as the proposal is reliant on the provision of such facilities via the adjacent airfield outline planning permission. A similar situation could exist in Bristol city centre where existing provision could be relied upon although other less central alternatives elsewhere may be required to provide car parking on site.
  - In order to test the suitability of alternative sites and premises, YTL has instructed Grimshaw architects to undertake an assessment of the scale of development which can be accommodated on alternatives. This exercise includes plans, to test the ground floor area of alternatives, and massing diagrams to show the scale of development which can be accommodated.
- **Availability**
    - National planning policy is clear as to how availability is to be assessed. The assessment needs to consider whether alternatives can be made available in a reasonable period. Therefore, sites which are currently occupied may still be 'available' for the purposes of the sequential test although AY and YTL are of the view that in such circumstances the site must be subject to a clear and deliverable plan of action to make it available within a three year period<sup>26</sup>.
    - YTL and AY are also of the view that for the site to be 'available' it must be available for the proposed development and not just an alternative collection of land uses.

- 3.62 In order to comply with the requirements of paragraph 87 of the NPPF, and in order to respond to the approach advocated in the Telford court judgement, there is a need to consider whether alternative out-of-centre sites on the short list are more accessible and better connected to nearby 'town centres'. In order to perform this assessment, YTL has instructed Hydrock to assess the accessibility characteristics of alternatives and to compare this against the accessibility characteristics of the Site. This process has considered accessibility by private car, public transport, walking and cycling and takes into account the package of transport infrastructure improvements which will be delivered as part of the Project.

---

<sup>26</sup> Which is considered to be a reasonable amount of time in this instance

## 4. Assessment of Alternatives

### Introduction

4.1 Following on from our assessment of the most robust way to approach the examination of the sequential test for the mixed use arena proposals at the Brabazon Hangar, we can now turn to the examination of the eleven short-listed sites and premises. These are:

- The former diesel depot at Temple Island in Bristol city centre;
- Newfoundland Way in Bristol city centre;
- The fruit wholesale market in St Philips, Bristol;
- Hengrove Park;
- The site of the planned University of the West of England stadium in Stoke Gifford;
- The Galleries shopping centre in Bristol city centre; and
- Land adjacent to the Bristol City Football Club stadium at Ashton Gate.

4.2 In order to assess each alternative location in detail, we have developed a standard proforma which provides the following information and analysis:

- Location, size of site, current land uses and surrounding land uses;
- Planning history and planning policy status;
- Analysis of site constraints;
- An analysis of whether the alternative site/premises lies in a sequentially preferable location to the Brabazon Hangar site;
- An analysis of whether each alternative can provide a suitable and available alternative for the proposed development, taking into account the need for flexibility.

4.3 The proformas are contained at Appendices I to XI and we summarise the findings for each site in turn below.

### Temple Island (Appendix I)

4.4 The Temple Island site is a vacant site which forms part of a wider allocated Temple Quarter regeneration area and which is promoted for employment-led mixed use development. Whilst the Bristol Central Area Plan makes indirect reference to the Temple Island site being 'the arena site', Policy BCAP35 does not specifically tie a new arena to the Temple Island site. Full planning permission has been granted for a 12,000 capacity arena on part of this site but the project has been abandoned by BCC in favour of an alternative mixed use development which it considers to be policy compliant and to have greater benefits for the city

centre. In addition, plans are now being progressed for student residential accommodation on the remainder of the site.

- 4.5 As a consequence, whilst this site is considered to be generally available for development, it is not available for a mixed use development which includes an arena use. Moreover, the Temple Island site is not large enough to accommodate the development proposed in the Brabazon Hangar application, taking into account reasonable flexibility, and is therefore not a suitable alternative site.

### **Newfoundland Way (Appendix II)**

- 4.6 The Newfoundland Way site lies in the north-eastern part of Bristol city centre and thus lies in a sequentially preferable location to the Brabazon Hangar site in an in-centre location in terms of leisure uses and an edge-of-centre location for retail uses. It is also allocated for mixed use development in the development plan.
- 4.7 However, our physical capacity testing of this site confirms that it is not large enough to accommodate the proposed development, even taking account of reasonable flexibility, as it can only accommodate an arena auditorium and part of The Hub. Also, an arena-led mixed use development on this site would not conform to adopted development plan policy. In addition, whilst a large part of the site is, we understand, available for redevelopment, it is not available for an arena-led mixed use development as an alternative set of land uses are being pursued.

### **Fruit Market (Appendix III)**

- 4.8 The fruit wholesale market site can be discounted from the sequential site analysis on the basis of the following reasons:
- This is an out-of-centre location which is not better connected and/or more accessible to nearby ‘town centres’ than the Brabazon Hangar site. Therefore, there is no formal requirement to consider whether it offers a suitable and available alternative to the application site.
  - Even when the issues of suitability and availability are considered, it is clear that (A) the fruit wholesale market site cannot accommodate a broadly similar type of development as proposed at the Brabazon Hangar site (as it cannot accommodate the Festival Hall), and (B) the site is not available for redevelopment for the proposed development within a reasonable period of time (due to no plans to redevelop this site).

### **Hengrove Park (Appendix IV)**

- 4.9 Hengrove Park is a key regeneration site in South Bristol and has seen recent development in terms of a new community hospital and leisure centre. A significant amount of the central and eastern areas of the park have recently been subject to an outline planning application for mixed use development which was being promoted by BCC. The scope of land uses in that application could not accommodate the type of retail and leisure and workspace uses being promoted by YTL at the Brabazon Hangar site. Planning permission was refused in March 2019 by BCC but a revised scheme now has Council support. The park is also allocated in the BCC Site Allocations and Development Management Policies Plan for open space, housing and offices, whilst the recently ‘made’ neighbourhood plan also identifies the site for open space and new homes. Therefore, whilst the site is large enough to accommodate a broadly similar type and scale of

development as the Brabazon Hangar proposal, it is not a suitable alternative due to the development plan allocations for site. In any event, our analysis of this site reveals that it is not location in a sequentially preferable location to the Brabazon Hangar site (as it is not more accessible and better connected to a town centre than the Site).

#### **UWE Stadium Site, Stoke Gifford (Appendix V)**

- 4.10 The UWE stadium site is large enough in principle to accommodate all relevant elements of the proposal, and have previously been considered to be available for development. However, this site can be discounted from the sequential site assessment as it does not provide a sequentially preferable alternative location to the Brabazon Hangar site (as it is not more accessible and better connected in relation to a town centre than the Site) and, in planning policy terms, it is not a suitable alternative.

#### **The Galleries (Appendix VI)**

- 4.11 The Galleries shopping centre lies in an in-centre location (in terms of both retail and leisure uses) and therefore can be considered to be a sequentially preferable location to the Brabazon Hangar site. However, an analysis of the physical capacity of the site reveals that it can only accommodate the arena auditorium element of the proposal and even that can only be accommodated in a compromised form. Therefore, the Galleries shopping centre site cannot accommodate a broadly similar form of development to the Brabazon Hangar proposals and therefore is not a suitable alternative.

#### **Bristol City FC, Ashton Gate (Appendix VII)**

- 4.12 This site is, we understand, subject to emerging proposals for a 4,000 capacity sports and conference facility. However, this site does not lie in a sequentially preferable location to the Brabazon Hangar site (as it is not more accessible and better connected to a town centre than the Site) and, in any event, cannot due to its size accommodate a broadly similar type and scale of proposal as YTL's proposal. As a consequence, it can be discounted from the sequential site assessment.

#### **Horsefair / Callowhill Court (Appendix VIII)**

- 4.13 This site, which lies in a sequentially preferable location, can be discounted on the basis that (A) it is too small to accommodate the proposal even taking into account reasonable flexibility, and (B) the content of the proposal at the Brabazon Hangar site is inconsistent with the development plan allocation and outline planning permission (for retail-led mixed use development) for the site.

#### **Avonmeads Retail Park (Appendix XI)**

- 4.14 Based upon the analysis in the relevant appendix to this report, this site can be discounted on the basis that it does not lie in a sequentially preferable location to the Brabazon Hangar site (as it is not more accessible and better connected to a town centre than the Site) and, in any event, cannot accommodate the proposal (taking into account reasonable flexibility) due to its size and format (and surrounding constraints).

#### **Redcliffe Village (Appendix X)**

- 4.15 This site lies in a sequentially preferable location to the Brabazon Hangar site. However, it is not a suitable alternative on the basis of its size, development plan allocation and extant planning permission. In addition,

whilst it is generally available for the introduction of new land uses, it is not available to accommodate the proposal itself (due to it being promoted for alternative land uses).

#### **Union Street / Silver Street / All Saints Street (Appendix IX)**

- 4.16 Finally, the Union Street site is considered to be an unsuitable and unavailable alternative on the basis of (A) its small size and configuration, (B) recent redevelopment of the site for new modern retail units along Union Street, and (C) development plan allocation.

## 5. Summary and Conclusions

- 5.1 This report has been prepared by AY for YTL Developments (UK) Ltd ('YTL') in relation to a planning application (Application A) for a proposed mixed use arena development at the Brabazon Hangar site in Filton, Bristol. It addresses the sequential test which is a key planning policy test in the development plan for the local area and national planning policy for main town centre use proposals located outside of town centres.
- 5.2 Application A comprises the following main town centre uses:
- Within the Central Hangar, a 17,000 capacity arena auditorium is proposed, being accommodated within circa 42,000sq m of floorspace.
  - Within the two adjacent hangars, it is proposed to provide The Hub and Festival hall elements. The Festival hall is proposed to be a flexible event and exhibition space with a 5,800sq m event hall, 800sq m associated with 'back of house' space and 3,400sq m of flexible space. The Festival hall is intended to be used in conjunction with large scale events in the main arena auditorium. The Hub will be 18,450sq m of mixed use space for leisure and food and beverage uses.
- 5.3 This document has analysed salient planning policy in the development plan for Bristol and also national planning policy in the 2019 version of the NPPF. It has also examined relevant case law and recent Secretary of State decisions on retail and leisure development in order to define the correct approach to the application of the sequential test in this instance and also the approach to assessing the suitability and availability of alternative sites and premises and also a reasonable and balanced approach to the need to demonstrate flexibility in scale and format.
- 5.4 This document has explained why the area of search for alternative sites should be concentrated upon the Bristol urban area and how a 'long list' of alternative sites and premises has been reduced down to a 'short list' of eleven alternatives for detailed examination. These eleven alternatives have been assessed in terms of their individual characteristics, planning history, planning policy status and whether they lie in sequentially preferable locations to the Brabazon Hangar site. For those that do, we have assessed whether they can offer suitable and available alternatives for broadly the same type of development being proposed in the Brabazon Hangar site.
- 5.5 This detailed analysis has revealed that none of the alternatives can be regarded as suitable and available alternatives and, therefore, it is considered that, based on the information available at the time of preparing and finalising this pre-application report, the provisions of the sequential test have been met.

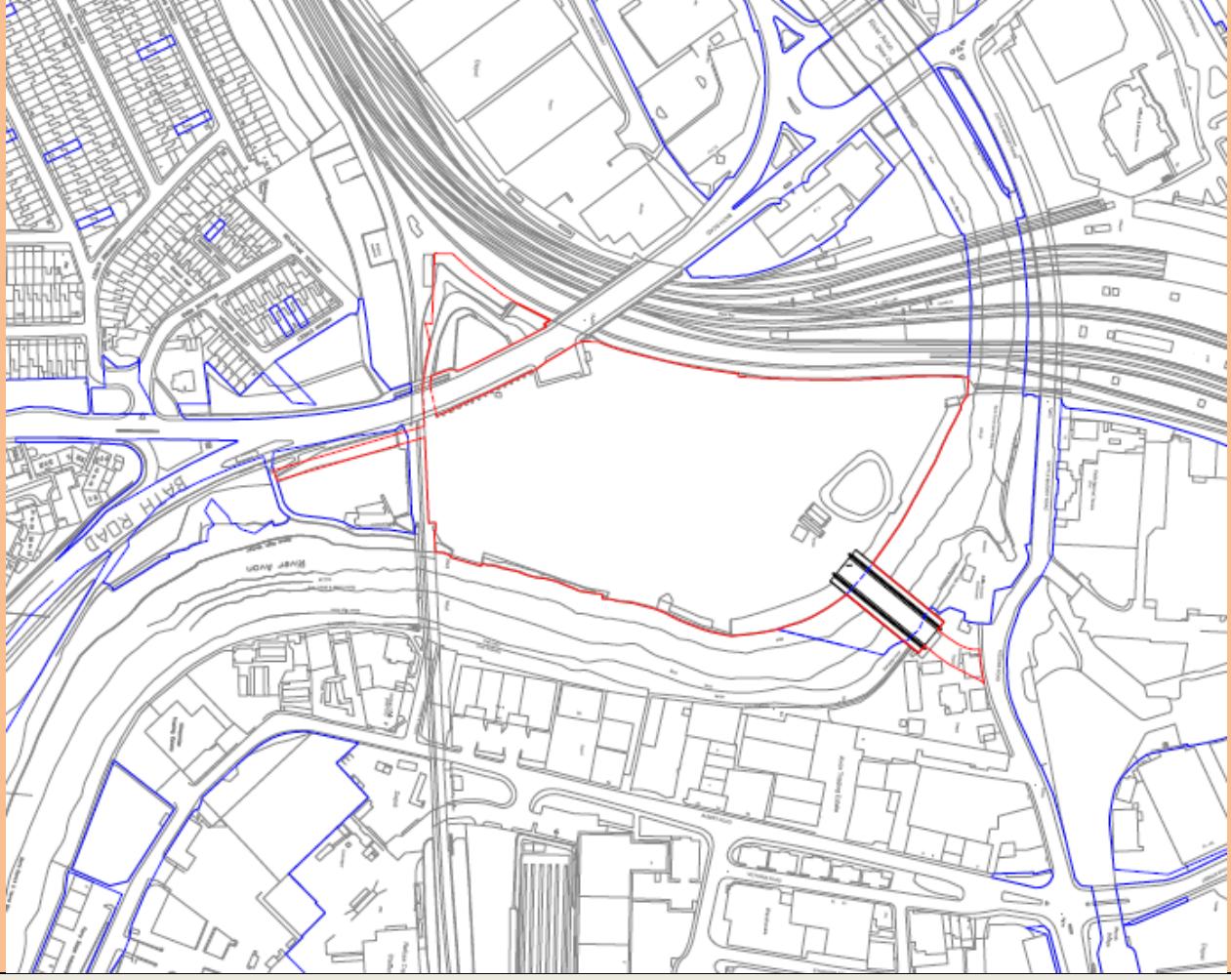
### Conclusions

- 5.6 Based upon the contents of this report, we are able to conclude that:
- Following examination of a range of short-listed sites and premises across the Bristol urban area, there are not any sequentially preferable locations which can accommodate the proposal, taking into account reasonable flexibility.

- As a consequence, the provisions of the following local and national policies are satisfied insofar as the sequential test only is concerned:
  - Policy DM7 of the Bristol Site Allocations and Development Management Policies Plan
  - Policy BCS7 of the Bristol Core Strategy
  - Paragraphs 86 and 87 of the 2019 version of the NPPF

# Appendix I

## Temple Island

|                         |  |  |  |
|-------------------------|--|--|--|
| <b>SITE REFERENCE:</b>  | 1  | <b>SITE NAME:</b> Former Diesel Depot ('the Temple Island site') |  |
| <b>SITE DESCRIPTION</b> |  |  |  |
| Location                | Bath Road / Cattle Market Road   |  |  |
| Site size               | 3.7 ha   |  |  |
| Current land uses       | The Temple Island site was formerly a diesel depot linked to Temple Meads, with large heavy industrial buildings and rail infrastructure. It is currently open cleared land, which has been partially remediated, but is urban, previously developed land.   |  |  |
| Adjoining land uses     | Mainly employment relating to office, commercial, and light industrial premises situated around Temple Quay, St Philips Marsh, and the York Road.  |  |  |
| Planning policy status  | <p>Allocated Site. The site falls within the Bristol Temple Quarter area (Policies Map Site KS01) within the adopted Bristol Central Area Plan (2015). This area is proposed for employment led mixed use development quarter in the city centre.</p> <p>The relevant adopted local policies are set out in the Bristol Local Plan Core Strategy (2011); Development Management Policies (2014); and the Bristol Central Area Plan (2015).</p> <p><u><a href="#">Bristol Local Plan Core Strategy (2011)</a></u></p> <p>Policy BCS2 concerns Bristol City Centre, and expands the boundary of the designated centre to include this site. It promotes the strengthening of the city's role as a regional focus through the mixed use development including 'offices, residential, retail, leisure, tourism entertainment and arts and cultural facilities.' Other policies within the Core Strategy that are particularly relevant to any development proposal are as follows:</p> |  |  |

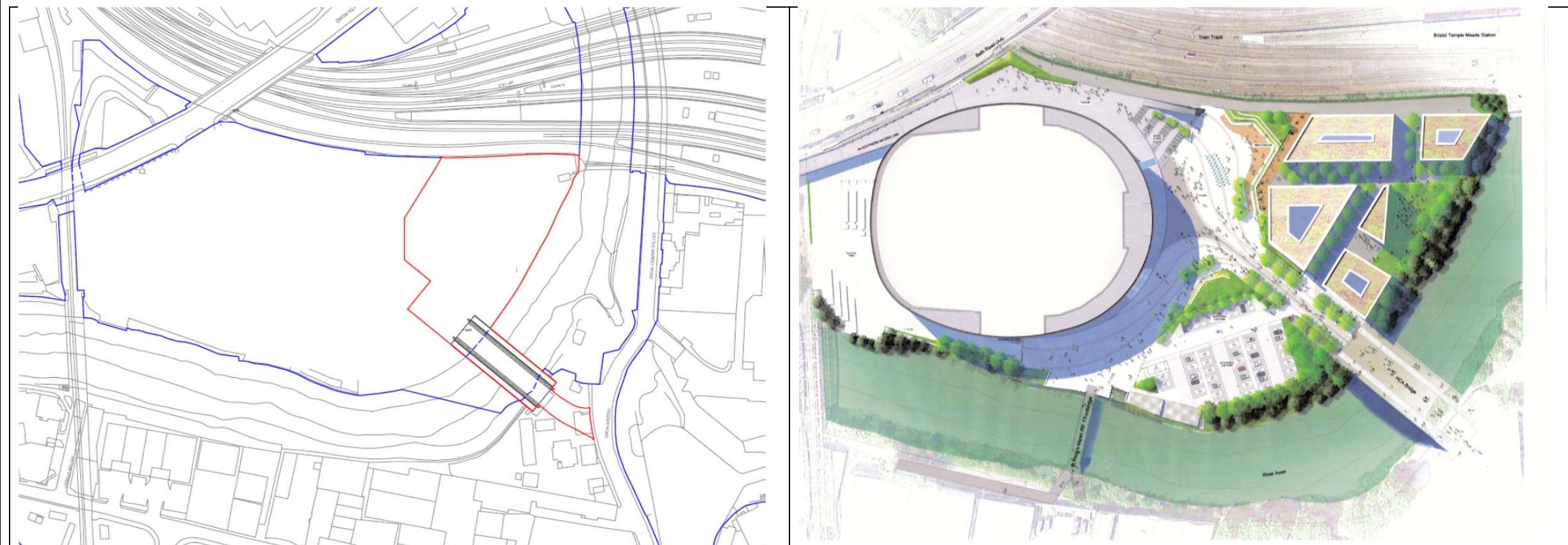
|                                       |  |
|---------------------------------------|--|
|                                       | <p>BCS7: Centres and Retailing<br/>BCS8: Delivering a Thriving Economy<br/>BCS9: Green Infrastructure<br/>BCS10: Transport and Access Improvements<br/>BCS16: Flood Risk and Water Management<br/>BCS21: Quality Urban Design</p> <p><a href="#">Bristol Local Plan Site Allocations and Development Management Policies (2014)</a></p> <p>Policies within the Development Management Policies that are particularly relevant to any development proposal are as follows:</p> <p>DM15: Green Infrastructure Provision<br/>DM23: Transport Development Management<br/>DM27: Layout and Form<br/>DM28: Public realm<br/>DM29: Design of New Buildings</p> <p><a href="#">Bristol Local Plan – Bristol Central Area Action Plan (2015)</a></p> <p>Policy BCAP35, which provides more detail on the Temple Quarter neighbourhood, echoes the requirement for a wide range of uses as part of the growth and regeneration of the area. In total, the policy BCAP35 sets out aspirations for the following:</p> <ul style="list-style-type: none"><li>- A major indoor arena and complementary leisure uses;</li><li>- At least 100,000m<sup>2</sup> of net additional high quality office and flexible workspace;</li><li>- Up to 2,200 new homes including live/work space;</li><li>- Hotel and conference facilities;</li><li>- Complementary retail and leisure uses, particularly within and adjacent to Bristol Temple Meads station;</li><li>- New walking and cycle routes to connect the developments to the rest of the city centre and surrounding neighbourhoods;</li><li>- Green infrastructure and public realm improvements.</li></ul> <p>Other policies within the Bristol Central Area Action Plan that are particularly relevant to any development proposal are as follows:</p> <p>BCAP1: Mixed-use Development in Bristol City Centre<br/>BCAP3: Family Sized Homes<br/>BCAP6: Delivery of Employment Space in Bristol City Centre<br/>BCAP9: Cultural and Tourist Facilities and Water-based Recreation<br/>BCAP20: Sustainable Design Standards<br/>BCAP21: Connection to Heat Networks<br/>BCAP22: Habitat Preservation, Enhancement and Creation of Waterways<br/>BCAP23: Totterdown Basin Enhancement<br/>BCAP25: Green Infrastructure in City Centre Developments<br/>BCAP28: New Interchange Facilities<br/>BCAP29: Car and Cycle Parking</p> |
| Planning Application Relevant History | <p>There have been three notable planning applications for the redevelopment of different parts of this site in recent years:</p> <ul style="list-style-type: none"><li>• 15/06069/F – full planning application for a 12,000 capacity arena and associated development ('the BCC arena application')</li><li>• 15/06070/P – outline application for 19,000sq m of mixed use development including retail, office, leisure, hotel, residential and student accommodation ('the BCC outline application')</li><li>• 17/06459/P – outline planning application for mixed use development across part of the former diesel depot site and the former postal sorting office site on Cattle Market</li></ul>  |

Road (including student accommodation, retail, office and leisure uses on the former diesel depot site) ('the University outline application')

### The BCC Outline Application

The planning application site for the BCC outline application (15/06070/P) is shown below. It covers the area proposed for the 200 space temporary car parking area for the arena (full) permission and shares the same access. An extract from the illustrative masterplan for the outline scheme is also contained below and shows how the site could be redeveloped. The approved description of development is as follows:

*"Outline application (All Matters Reserved) for up to 19 000sqm of mixed use development on Arena Island comprising retail (Use Classes A1, A2, A3, A4); offices (Use Class B1); leisure (Use Class D2); residential dwellings, including affordable housing (Use Class C3); hotel (Use Class C1) and student accommodation (Sui generis). Provision of associated hard and soft landscaping, including linkages to the plaza and HCA Bridge".*

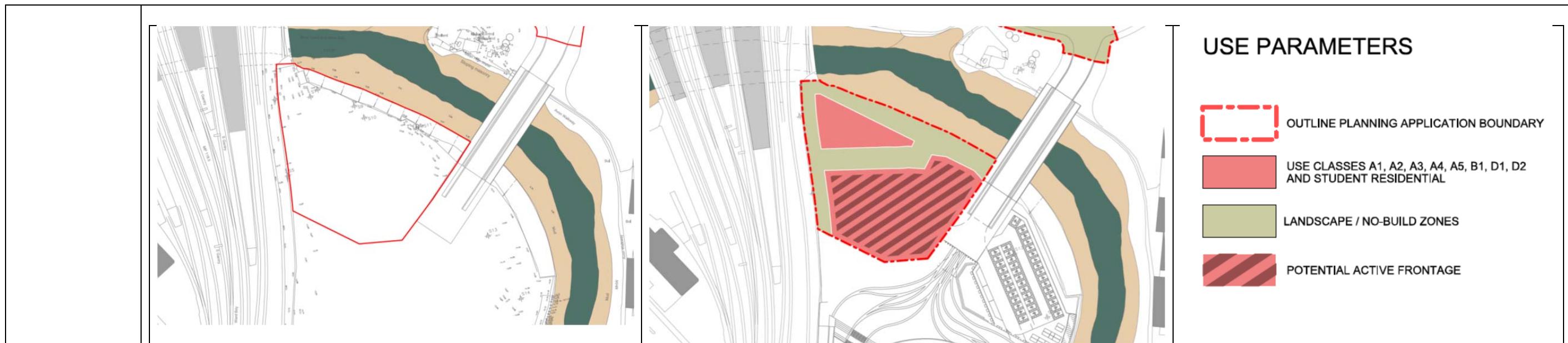


### The University Outline Application

Subsequently, in 2017 a further outline planning application was submitted on the site of the BCC outline application area plus the former postal sorting office site on the other side of the River Avon and Cattle Market Road. The application was submitted by the University of Bristol ('the University') and it is understood that the University have secured a controlling interest in the land subject to the BCC outline application. The description of development is as follows:

*"Outline application for a new mixed use University Campus (Use Classes A1,A2,A3,A4,A5,B1(a),D1,D2) to comprise of up to 82,395sq m (GIA) of floor space including up to 1,500 students beds with all matters reserved except access. Alterations to Cattle Market Road & provision of an Energy Centre (to consider Access)".*

The application site area is shown below along with the land use parameter plan.



The University outline application has not yet been formally decided by BCC although its Development Control B committee resolved, in July 2018, to grant outline planning permission subject to the completion of a Section 106 legal agreement and the removal of an objection by the Environment Agency ('EA'). The EA objection has now been removed.

|             |   |
|-------------|---|
| Constraints | <p><b>Flood Risk</b></p> <ul style="list-style-type: none"> <li>Despite its proximity to the River Avon (Classified Main River), the site sits on an elevated platform and is therefore located within an area considered to be at a low risk of flooding (Flood Zone 1). Flood Zone 3 surrounds the periphery of the site.</li> </ul> <p><b>Conservation &amp; Heritage</b></p> <ul style="list-style-type: none"> <li>The site does not include any listed buildings or structures, and is not located within a conservation area. However, the railway platforms that adjoin the North West corner of the site are part of Temple Mead Station, which is Grade I Listed. Temple Gate and Three Lamps sign Post (both Grade II*) are also nearby.</li> <li>Due to the proximity of Temple Meads station to the site, the setting of the Grade I and II* listed structures that form part of the complex as noted above will be impacted. Given the proximity of the site to Temple Meads, it is likely that buildings created by any regeneration of the site would impact the setting of these heritage buildings to a certain extent given the need to deliver efficient and effective reuse of previously developed land.</li> <li>Bristol &amp; Exeter House, the Marble Mosaic Company and St Vincent's Works are all Grade II Listed Buildings in relative proximity to the site also. The closest boundary of the Redcliffe Conservation Area lies approximately 350m to the west of the site.</li> <li>The only standing heritage assets on the site are the retaining wall adjoining Bath Road and a stretch of retaining wall adjacent to the river. Both are undesignated.</li> </ul> <p><b>Archaeology</b></p> <ul style="list-style-type: none"> <li>The site has low potential for buried archaeological remains over the southern part of the main area east of Bath Road. There is limited potential for fragmentary remains following the site being cleared and decontaminated.</li> </ul> <p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>The site has the potential for significant emissions to the detriment of air quality. The site is located within the city's Air Quality Management Area (AQMA), which broadly covers the city centre and main arterial routes leading into the city. The AQMA has poor nitrogen dioxide levels.</li> </ul> <p><b>Noise</b></p> <ul style="list-style-type: none"> <li>The site has been derelict for the considerable period of time and therefore, there is no operational noise being generated from it at present. The existing predominant noise in the area, which makes up the background noise, is generated from road traffic and train movements. Potentially sensitive receptors to the proposed developments include Albert Road, specifically the RSPCA Dogs Home, and the residential area of Totterdown, which sits on a slope above the site and is therefore susceptible to noise.</li> </ul> |
|-------------|---|

|  |  |
|--|--|
|  | <p>from below.</p> <p><b>Contamination</b></p> <ul style="list-style-type: none"><li>- The site has already been partially remediated by Homes England as part of enabling works, which included soil washing. However, contamination (Made Ground) remains in some locations, particularly around the river boundaries and perimeter.</li></ul> <p><b>Ecology &amp; Arboriculture</b></p> <ul style="list-style-type: none"><li>- There are no statutory designated nature conservation sites within 1km of the application site.</li><li>- The site has low ecological value but the River Avon SNCI and the railway lines are identified as Wildlife corridors around the site.</li></ul> |
|--|--|

#### IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?

The two closest primary shopping areas ('PSA') to the subject site are Broadmead and Bedminster.

From the edge of the subject site, the walking distances to these PSAs are 1.3km and 1.4km respectively.

On face value this would make the subject site an out-of-centre site, although it must be noted that it does lie within the boundary of Bristol city centre.

Moreover, it is clear that this is an accessible site via a choice of modes of transport, given the close proximity of Temple Meads railway station and bus routes running along Temple Gate and Bath Road.

As a consequence, even if the subject site is to be considered an out-of-centre site, it is reasonable to conclude that it is more accessible and better connected in relation to Bristol city centre than the application site and therefore lies in a sequentially preferable location. Consideration must therefore be given to whether it can provide a suitable and available alternative.

#### IS THE SITE A SUITABLE ALTERNATIVE?

Given the history of the Temple Island site, there is a need to ask two questions in relation to its 'suitability':

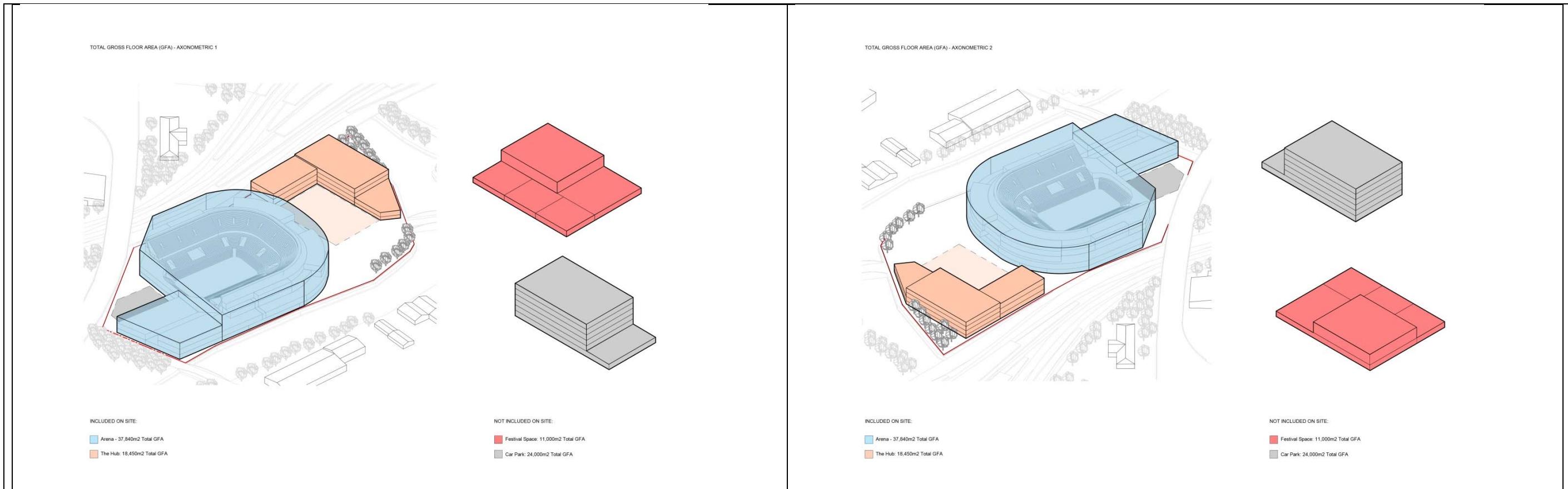
1. is it technically suitable for the core arena use and the other land uses proposed at the Brabazon Hangar?; and
2. is it actually a genuinely suitable site for the land uses proposed?

In terms of technical suitability (i.e. can the proposed uses / floorspace be successfully accommodated?), there are a number of issues to consider. It is clear that a 12,000 capacity arena use can be successfully accommodated on the area of land in the control of BCC. This has been proven by the grant of full planning permission by BCC. However, all of the land in control of BCC is required for the core arena use and supporting infrastructure and there is no room (on the BCC land) to accommodate any of the other proposed floorspace which is required to support the core arena use. This is proven in the diagrams below.

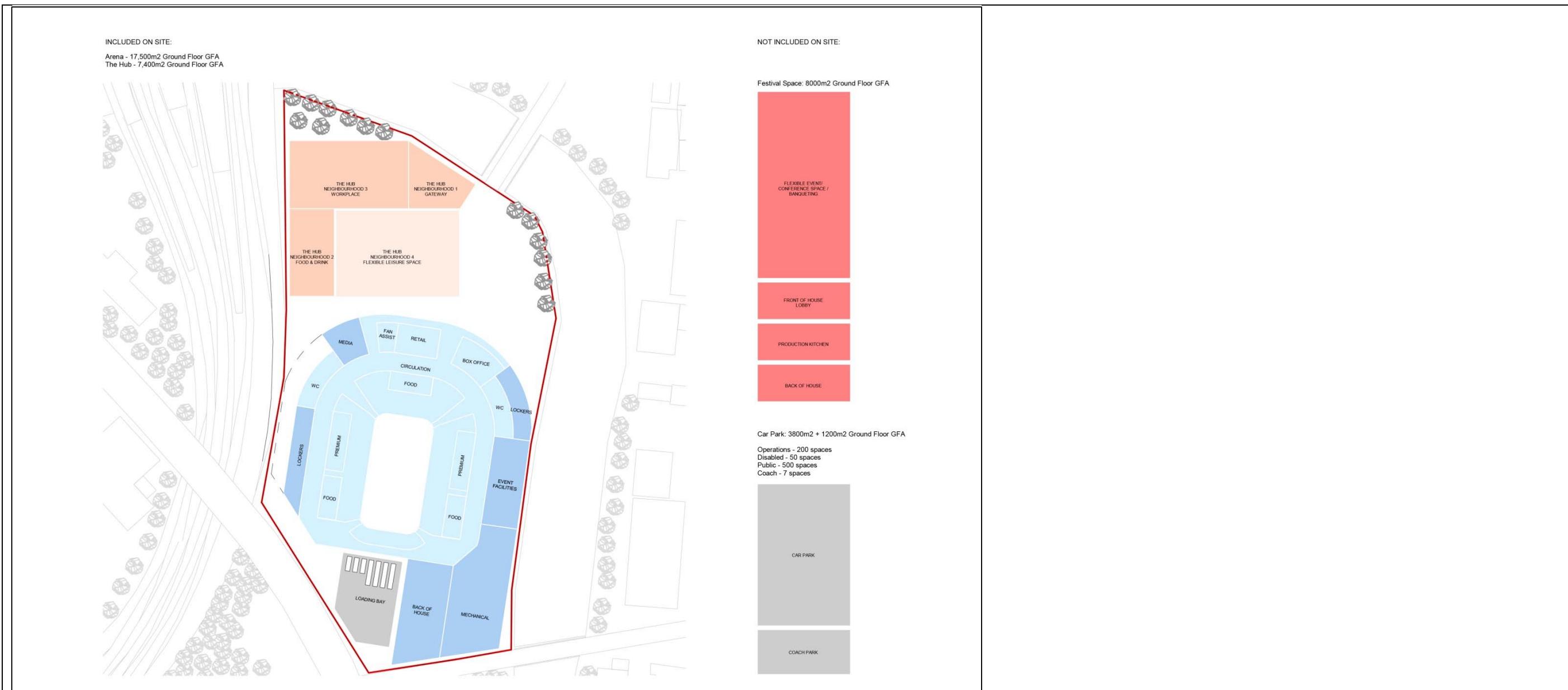
There is a further area of land now in the control of the University of Bristol. Leaving aside the fact that the University wish to provide student residential accommodation across the whole of this site, this area of land has been subject to two recent proposals for 19,000sq m of floorspace (the BCC outline application) and 30,050sq m of floorspace (the University outline application).

Whilst this suggests that the remainder of the site could potentially accommodate a similar scale of floorspace as the Brabazon Hangar proposals (excluding the core arena area), the format of this floorspace can only be provided in 'tall buildings' with small footprints given the small size of the University controlled land. This is inappropriate for the proposed development as the Hub and Festival Space land use elements need large footprints given the nature of these uses and this cannot be accommodated on the University land. The inability of the site to accommodate both of these elements is demonstrated by the diagrams below, with only one being accommodated. This is beyond any reasonable flexibility and makes the site unsuitable for the proposal.

It is also to be noted that the planning application for the arena use identified that additional car parking capacity was required in the city centre, for both VIP and general parking, and that the location of this additional capacity was never resolved and was confirmed to be contrary to policy.



In addition, it should be noted that the BCC arena application proposed a 12,000 capacity arena. The capacity of the main auditorium at the Brabazon Hangar proposal is 17,000 and other parts of this sequential test document justify why this level of capacity is needed in order to make the arena project viable. Therefore, whilst there is a need for flexibility when assessing alternative sites and premises, a reduction of 30% is very likely to have a significant impact upon the viability of the Temple Island site from a 'suitability' perspective. In addition, the diagram below shows that in order to accommodate a 17,000 capacity arena the full width of the site is required which raises significant concerns over the impact on the River Avon, impact on the adjacent railway lines and the inability to properly service the main auditorium for live events. This also makes the site an unsuitable alternative for the proposal.



The other question to be answered is whether the Temple Island site is a genuinely suitable alternative to the Brabazon Hangar site. Through 2018, BCC (supported by various consultants) undertook a review of the Temple Island arena project, including value for money assessments and consideration of alternatives. This ultimately resulted in BCC abandoning the project, as outlined in the 'availability' section below. Informing BCC's decision was a report to BCC's Cabinet on 4<sup>th</sup> September 2018 which noted *inter alia* the following:

- Developments of cultural assets, such as arenas, normally require public sector intervention and funding, because in general the returns realised are not sufficient for them to be funded by private sector investment.
- The Temple Island proposal for a 12,000 capacity Arena would require public sector investment of £173m (which includes investment in car parking) and BCC would bear the development risk alongside the contractor.
- It is the Council's view that this increased level of economic impact and job creation, for the alternative scheme, would clearly have a greater impact on the vitality of the City Centre. The jobs associated with the alternative proposals for a mixed use scheme at Temple Island are more likely to be of a regular nature than the employment patterns typically associated with entertainment venues which require increased staffing when events are being staged.
- Should an arena at Temple Island be preferred, further car parking would need to be identified within close proximity. An initial study on additional sites, including 1-9 Bath Road and Portwall Lane, is complete and this work will be taken forward if the Temple Island Arena proceeds (though no decision on the Portwall Lane site has been agreed).

As a consequence of the above, the only reasonable conclusion which can be reached is that the Temple Island site is not a suitable alternative for the proposed development, taking into account flexibility, due to its inability to accommodate the proposed type and scale of uses required to make a genuinely viable arena project and its genuine suitability to accommodate an arena project when reasonable alternatives, which provide more benefits, are taken into account.

#### IS THE SITE AN AVAILABLE ALTERNATIVE?

This is a vacant and cleared site and has been promoted for redevelopment for several years. It is now in the ownership of two parties: BCC own the larger portion, with the University of Bristol now owning an element in the northern part of the site. Both parties have an indication to promote both sites for redevelopment. It is therefore reasonable to conclude that the site is available in general terms.

However, BCC has abandoned its plans for an arena development on its portion of the site. This decision was made at a Cabinet meeting on the 4<sup>th</sup> September 2017 when "the Council resolved not to progress further with the proposed arena on Temple Island and to take all steps necessary and incidental to the cessation of that project" and "The Council would continue to work with partners to develop an alternative mixed scheme for the Temple Island site, with a view to bringing a worked up proposal(s) back to cabinet in due course. Ideally, any proposal should include the following uses: conference centre and 4/5\* hotel facility; commercial space with the supporting retail offer; residential units. Including a policy compliant level of affordable housing". BCC are now working with Legal & General to bring forward this alternative mixed use scheme which has formal Council support/approval.

Therefore, whilst generally available for development, it is clear that the actions taken by BCC in 2018 have concluded that its land holding on Temple Island is not available for an arena-led development and therefore this is a clear and unavoidable reason for discounting this part of the Temple Island site.

The University of Bristol are, as outlined above, are pursuing plans for student accommodation on their element of the Temple Island site. Therefore, whilst generally available for development, the University owned element is not available for arena-led development and can therefore also be discounted from the sequential test.

#### CONCLUSION

The Temple Island site is a vacant site which forms part of a wider allocated Temple Quarter regeneration area and which is promoted for employment-led mixed use development. Whilst the Bristol Central Area Plan makes indirect reference to the Temple Island site being 'the arena site', Policy BCAP35 does not specifically tie a new arena to the Temple Island site. Full planning permission has been granted for a 12,000 capacity arena on part of this site but the project has been abandoned by BCC in favour of an alternative mixed use development which it considers to be policy compliant and to have greater benefits for the city centre. In addition, plans are now being progressed for student residential accommodation on the remainder of the site.

As a consequence, whilst this site is considered to be generally available for development, it is not available for a mixed use development which includes an arena use. Moreover, the Temple Island site is not large enough to accommodate the development proposed in the Brabazon Hangar application, taking into account reasonable flexibility, and is therefore not a suitable alternative site.

# Appendix II

## Newfoundland Way

|                         |   |                                    |  |
|-------------------------|---|------------------------------------|--|
| <b>SITE REFERENCE:</b>  | <b>28</b>   | <b>SITE NAME:</b> Newfoundland Way |  |
| <b>SITE DESCRIPTION</b> |   |                                    |  |
| Location                | Situated directly adjacent to the A4032 – Newfoundland Way – in the north-eastern part of Bristol city centre. The extent of the site is framed by Newfoundland Way to the west, Houlton Street to the south and Wellington Road to the east. Elton Street and Clement Street lie within the site area.   |                                    |  |
| Site size               | 2.2 ha  |                                    |  |
| Current land uses       | The site comprises of multiple existing uses with a mixture of retail (Office Outlet & Nisbets), industrial/commercial uses and the Riverside Youth Project building. These uses have associated areas of hard standing for the provision of car parking.   |                                    |  |
| Adjoining land uses     | Cabot Circus shopping centre car park (and entrance) to the south, residential and commercial uses on the opposite side of Newfoundland Way to the west, Riverside Park to the north-east and further commercial uses to the east (on the opposite side of the River Frome).  |                                    |  |
| Planning policy status  | <p>Allocated Site within the development plan. The site falls within the Bristol Local Plan - Bristol Central Area Plan (Policies Map Site KS09) with development proposed for a mix of high density city centre uses incorporating employment, new homes, and leisure or other supporting city centre uses.</p> <p>The relevant adopted local policies are set out in the Bristol Local Plan Core Strategy (2011); Development Management Policies (2014); and the Bristol Central Area Plan (2015).</p> <p><u><a href="#">Bristol Local Plan Core Strategy (2011)</a></u></p> <p>Policy BCS2 concerns Bristol City Centre, and expands the boundary of the designated centre to include the application site. It promotes the strengthening of the city's role as a regional focus through the mixed use development including 'offices, residential, retail, leisure, tourism entertainment and arts and cultural facilities.' Other policies within the Core Strategy that are particularly relevant to any development proposal are as follows:</p> <p>BCS7: Centres and Retailing</p> |                                    |  |

BCS8: Delivering a Thriving Economy  
BCS9: Green Infrastructure  
BCS10: Transport and Access Improvements  
BCS16: Flood Risk and Water Management  
BCS21: Quality Urban Design

[Bristol Local Plan Site Allocations and Development Management Policies \(2014\)](#)

Policies within the Development Management Policies that are particularly relevant to any development proposal are as follows:

DM15: Green Infrastructure Provision  
DM17: Development involving existing Green Infrastructure  
DM23: Transport Development Management  
DM27: Layout and Form  
DM28: Public realm  
DM29: Design of New Buildings

[Bristol Local Plan – Bristol Central Area Action Plan \(2015\)](#)



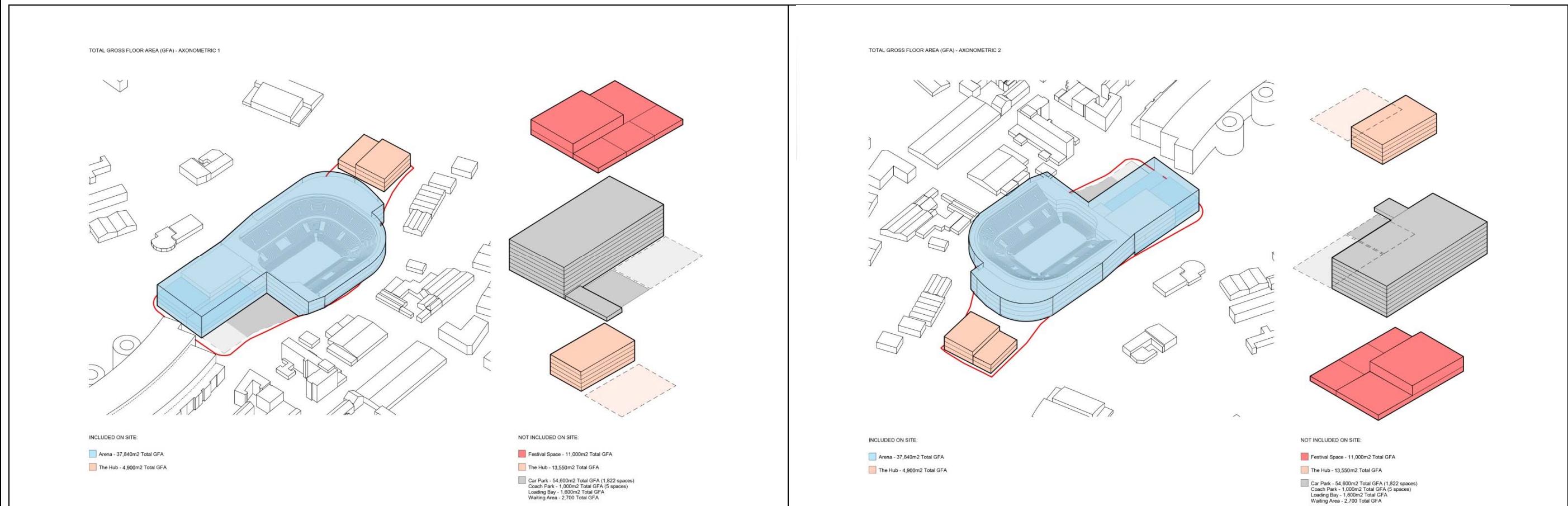
|  |  |
|--|--|
|  | <p>Policy BCAP39, which provides more detail on the city centre expansion at Newfoundland Way identifies the overall approach is to create a high quality mixed use development with its own distinct identity that both extends the city centre and enhances an important entry to it through the provision of a high density development form. Policy BCAP39 sets out aspirations for the following:</p> <ul style="list-style-type: none"><li>- Enhanced built form and public realm, a continuous strong frontage to Newfoundland Way, footways and active frontages to Wellington Road and Houlton Street, and improvements to Newfoundland Way to create a significantly enhanced entry point to the city centre.</li><li>- Site is identified as KS09 in the Central Area Plan and is shown on an extract from the policies map above.</li><li>- Allocated for employment, residential, leisure and other supporting city centre uses.</li><li>- A mix of housing types on the upper floors, with workspace and/or leisure or other supporting city centre uses at ground floor level.</li><li>- Significant improvements to pedestrian, cycle and green infrastructure links including green corridors along Newfoundland Way/Clement Street, an enhanced setting for the River Frome at Wellington Road and a link to Dove Lane via crossing facilities over Newfoundland Way.</li><li>- Re provision of the existing community facility (presently the Riverside Youth Project).</li></ul> <p>Other policies within the Bristol Central Area Action Plan that are particularly relevant to any development proposal are as follows:</p> <p>BCAP1: Mixed-use Development in Bristol City Centre<br/>BCAP6: Delivery of Employment Space in Bristol City Centre<br/>BCAP20: Sustainable Design Standards<br/>BCAP21: Connection to Heat Networks<br/>BCAP22: Habitat Preservation, Enhancement and Creation of Waterways<br/>BCAP25: Green Infrastructure in City Centre Developments<br/>BCAP29: Car and Cycle Parking;</p>   |
| Constraints  | <p>Flood Risk</p> <ul style="list-style-type: none"><li>- Based on the EA flood mapping tool the site is situated predominately within Flood Zone 2. Flood Zone 3 does curtail the site on the corner of Elton Street with the majority of the Flood Zone 3 designation situated directly to the south off Wellington Road off site adjacent to the River Frome.</li></ul> <p>Air Quality</p> <ul style="list-style-type: none"><li>- The site has the potential for significant emissions to the detriment of air quality. The site is located within the city's Air Quality Management Area (AQMA), which broadly covers the city centre and main arterial routes leading into the city. The AQMA has poor nitrogen dioxide levels.</li></ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- The site has an important area of open space immediately to the north otherwise known as Riverside Park as designated on the policies map. The impact of development on green infrastructure assets with a nature conservation role is considered under policy DM19.</li><li>- The St Paul's Green Link dissects through the site (BCAP24: The St Paul's Green Link) Notably, development on this site will be expected, where appropriate and feasible, to contribute to the delivery of that green link through the provision of a continuous walking/cycling route on an appropriate alignment incorporating street trees, open space and other forms of green infrastructure.</li><li>- Within close proximity to the site beyond Newfoundland Way to the north 'The Old School House' a Grade II listed building is present.</li><li>- Situated directly to the east of this Grade II listed building is the designated conservation area of Portland &amp; Brunswick Square.</li></ul> <p>Ground</p> <ul style="list-style-type: none"><li>- Based on the existing land uses and surrounding uses designated within the Principal Industrial &amp; Warehousing Areas (PIWA) the site is likely to have contamination present and areas of made ground that will need remediating pending further investigation.</li></ul> |
| <p><b>IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?</b></p>  |  |
| <p>Site lies within the defined city centre boundary and to the north of the defined primary shopping area across Cabot Circus and Broadmead. Walking distance from the south-western edge of the site to the north-eastern edge of Cabot Circus (House of Fraser) is circa 200 metres. This makes the Newfoundland Way site an edge-of-centre site in retail terms and an in-centre site in relation to the other aspects of the proposal. Therefore in a sequentially preferable location to the Brabazon Hangar site.</p> |  |

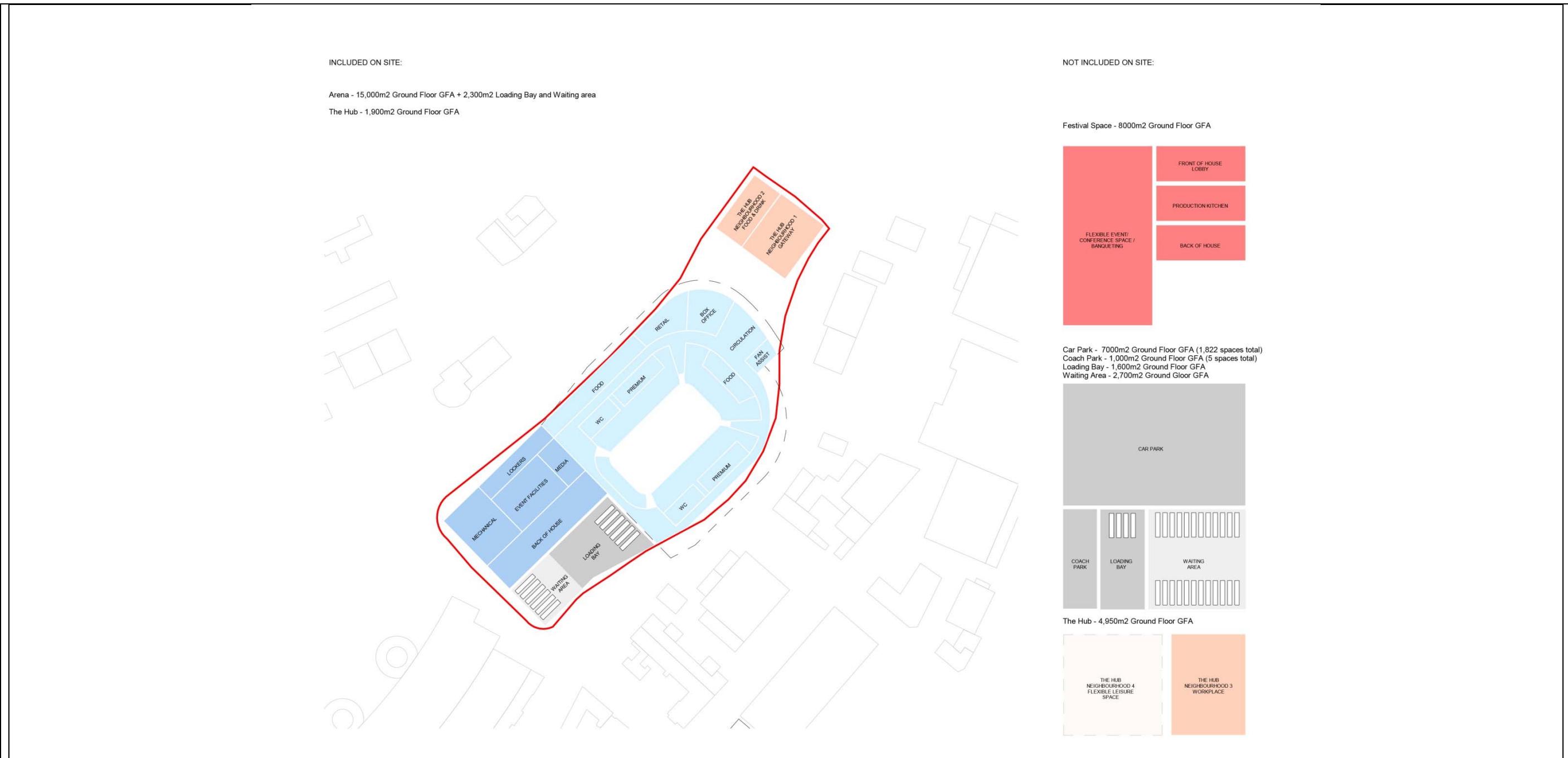
## IS THE SITE A SUITABLE ALTERNATIVE?

In policy terms, this site is not a suitable alternative for the proposal. It is allocated in the development plan for a mixed use development with clear guidance in Policy BCAP39 that there will be a mix of housing types on the upper floors of the development with other uses at ground floor level.

BCAP39 does encourage a high density form of development although the diagrams below show that the elements of the proposal cannot all be accommodated on the site.

Grimshaw have tested the physical capacity of the site to accommodate the various elements of the proposal. They show, for several different reasons, why the Newfoundland Way site is not a suitable alternative. First, the plan shows that the footprint of even only the arena auditorium cannot be accommodated on the site. It is simply too thin and narrow. Second, notwithstanding this draw-back, the back of house facilities would need to be arranged in an unsatisfactory way and they could not cover the full width of the auditorium if some limited HGV parking is to be provided for. Third, the majority of the Hub and all of the Festival Space elements cannot be provided on the site. Fourth, whilst this site lies within the city centre and is therefore accessible to a number of existing car parks, including the adjacent Cabot Circus car park, an arena will require on-site or adjacent VIP car parking. As shown in the diagrams and plans above, this cannot be accommodated on the site and it is not realistic to rely on the Cabot Circus car park for this provision. There are no other sites in the immediate area which are allocated for redevelopment and can provide multi-storey car parking provision. Fifth, there is not sufficient room for the coach parking and waiting areas and all of the HGV loading area. Sixth, the diagrams also clearly show that the scale and massing of a building large enough to accommodate the proposed arena auditorium is not appropriate for this particular site.





# IS THE SITE AN AVAILABLE ALTERNATIVE?

It is understood that parts of this available are available for redevelopment, but not the whole site. Therefore, the site is considered to be a partially available alternative but, as indicated above, even if the entire site were to be entirely available it still would not comprise a genuinely suitable alternative. In addition, we understand that a private sector developer is in the early stages of promoting a mixed use redevelopment scheme broadly in line with the development plan allocation and therefore, where generally available, it is not available for the arena proposal.

## CONCLUSION

This site lies in a sequentially preferable location to the Brabazon Hangar site in an edge-of-centre location. However, it is not large enough to accommodate the proposed development, even taking account of reasonable flexibility and an arena-led mixed use development on this site would not conform to adopted development plan policy. In addition, whilst a large part of the site is, we understand, available for redevelopment, it is not available for an arena-led mixed use development.

# Appendix III

## Fruit Market

|                         |   |   |   |
|-------------------------|---|---|---|
| <b>SITE REFERENCE:</b>  | <b>46</b>   | <b>SITE NAME:</b> Fruit Wholesale Market, Albert Road |  |
| <b>SITE DESCRIPTION</b> |   |   |   |
| Location                | Albert Crescent, Bristol. BS2 0YP   |   |   |
| Site size               | 5.7ha   |   |   |
| Current land uses       | The site is currently occupied by a number of fruit and vegetable wholesalers in light warehousing.   |   |   |
| Adjoining land uses     | Located in the St Philips Marsh Industrial Estate the site is surrounded by a mixture of light industrial and warehousing.  |   |   |
| Planning policy status  | <p>Site is located within a defined principal industrial and warehousing area on the Bristol development plan policies map.</p> <p>The relevant adopted local policies are set out in the Bristol Local Plan Core Strategy (2011); Development Management Policies (2014); and the Bristol Central Area Plan (2015).</p> <p><u><a href="#">Bristol Local Plan Core Strategy (2011)</a></u></p> <p>Policy BCS2 concerns Bristol City Centre, and expands the boundary of the designated centre. This notably does not include this Fruit Wholesale Market site as it encompasses only part of the St Philips area which lies to the north of the Feeder Canal.</p> <p>Other policies within the Core Strategy that are particularly relevant to any development proposal are as follows:</p> <p>Policy BCS8 - The economic performance of the city will be strengthened by providing a sufficient and flexible supply of employment land, addressing barriers to employment and promoting the city as a place to invest. New employment land will be provided in the period 2006-2026. This will include:</p> <ul style="list-style-type: none"> <li>- Up to 236,000m<sup>2</sup> of net additional office floorspace</li> <li>- Around 150,000m<sup>2</sup> in the city centre</li> <li>- Around 60,000m<sup>2</sup> in South Bristol</li> <li>- Around 26,000m<sup>2</sup> focused on town, district and local centres in the rest of Bristol.</li> <li>- Up to 10 hectares of additional industrial and warehousing land focused on the major regeneration areas in South Bristol.</li> </ul> |   |   |

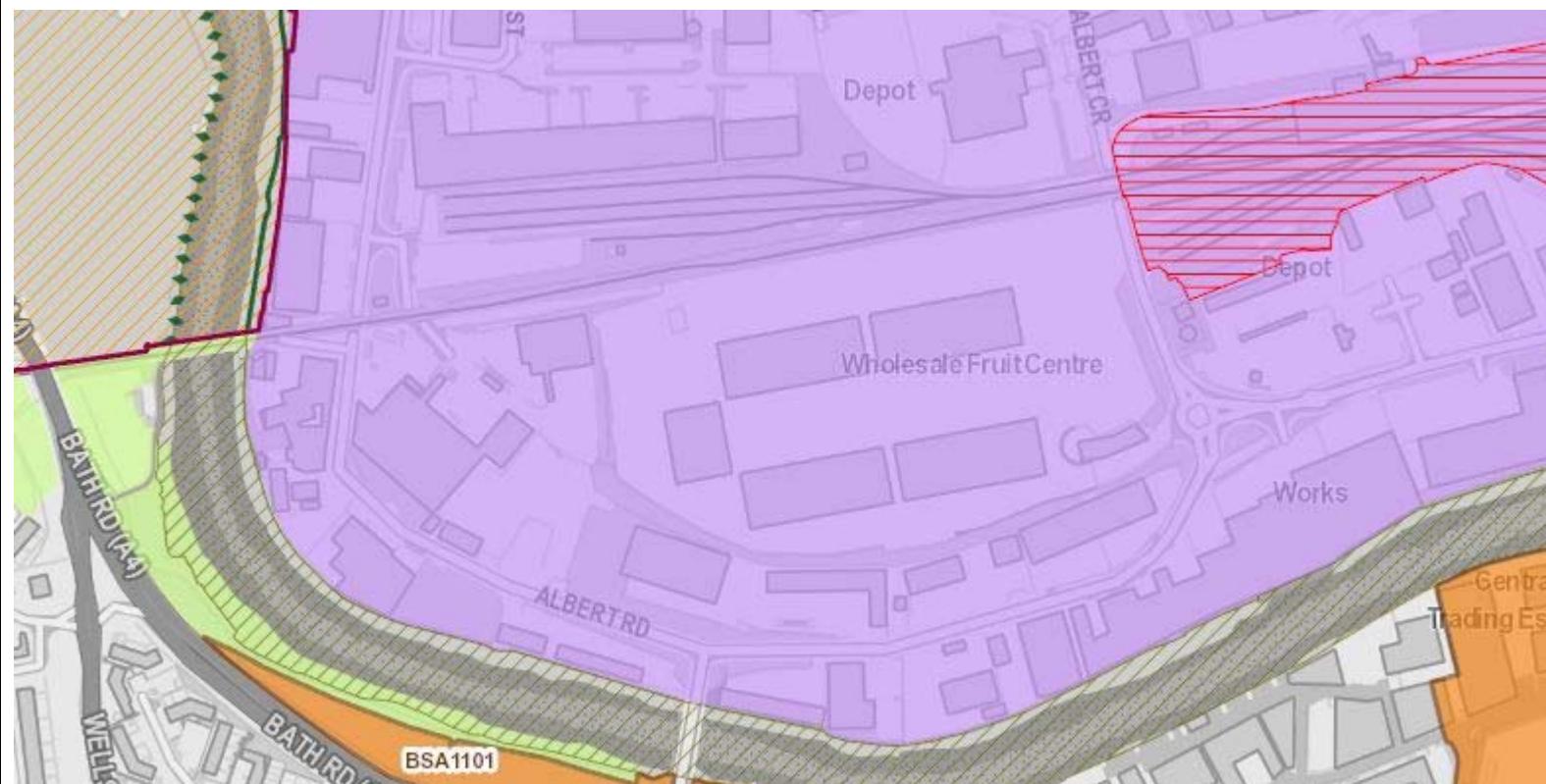
The site is situated within an existing industrial and warehousing area just outside the city centre, known as St. Philip's. This area continues to play an important role in supporting and complementing the more office-led employment offer of the city centre. Industrial and warehousing uses will therefore continue to be directed to this area, which will be safeguarded as a Principal Industrial and Warehousing Areas.

Other policies within the Core Strategy that are particularly relevant to any development proposal are as follows:

BCS10: Transport and Access Improvements

[Bristol Local Plan Site Allocations and Development Management Policies \(2014\)](#)

The policy within the Development Management Policies which is particularly relevant to any redevelopment proposal on this site is DM13 which set out the council's approach to proposals on allocated Principal Industrial and Warehousing Areas. As detailed above the Core Strategy states that the city's Principal Industrial and Warehousing Areas (PIWAs) will be identified and retained for industrial and warehousing uses. The site falls within this designated area. Due to their strategic economic importance the council will generally seek to resist proposals on PIWAs which would lead to a loss of industrial or warehousing floorspace. The extent of the allocated area across the site and surrounding area is shown below.



In addition to industry and warehousing (Use Classes B1b-B8 and sui generis uses of a similar nature), the following uses are also likely to be acceptable on Principal Industrial and Warehousing Areas shown on the Policies Map subject to other relevant development plan policies being satisfied:

- Industrial or commercial training facilities;
- Community facilities;
- Specialised leisure uses which cannot be accommodated in centres because of their scale and / or operational impacts;
- Essential public utilities development; and Ancillary facilities and services which support the functioning of the Principal Industrial and Warehousing Area including child care facilities, small-scale retail uses, sandwich shops and cafés.

Development involving the loss of industrial and warehousing floorspace within the Principal Industrial and Warehousing Areas will not be permitted unless the development is for a use referred to above, or:

|  |   |
|--|---|
|  | <ul style="list-style-type: none"><li>- It is demonstrated that there is no demand for: The use of the existing site / premises for industry or warehousing;</li><li>- The redevelopment of the site for new industrial or warehousing premises; and</li><li>- The proposal will not prejudice the function or viability of the rest of the Principal Industrial and Warehousing Area.</li></ul> <p>Other policies within the Core Strategy that are particularly relevant to any development proposal are as follows:</p> <p>DM24: Transport Schemes<br/>DM33: Pollution Control, Air Quality and Water Quality<br/>DM34: Contaminated Land<br/>DM35: Noise Mitigation</p> <p><u><a href="#">Bristol Local Plan – Bristol Central Area Action Plan (2015)</a></u></p> <p>The site falls outside the Bristol Temple Quarter designation, which for reference falls under Policy BCAP35 (Policies Map Site KS01).</p>  |
| Constraints  | <p>Flood Risk</p> <ul style="list-style-type: none"><li>- The majority of the site is situated in Flood Zone 1. However, the southern boundary of the site abutting Albert Road is situated in Flood Zone 3 due to the close proximity of the River Avon as a classified Main River.</li></ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- The River Avon is situated directly to the south and is designated as an SNCI. Particular ecological value is applied as a wildlife corridor.</li></ul> <p>Noise</p> <ul style="list-style-type: none"><li>- The site is set within a designated principal industrial &amp; warehousing area with high levels of environmental noise coming from the existing safeguarded freight railway line immediately to the north, with other associated noises coming from the surrounding light industrial uses and fixed plant associated with waste recycling, packaging, trade units, and a concrete and screed plant.</li><li>-</li></ul> <p>Air Quality</p> <ul style="list-style-type: none"><li>- The site has the potential for significant emissions to the detriment of air quality. The site is located within the city's Air Quality Management Area (AQMA), which broadly covers the city centre and main arterial routes leading into the city. The AQMA has poor nitrogen dioxide levels.</li></ul> <p>Ground</p> <ul style="list-style-type: none"><li>- Due to the nature of the use on site and surrounding uses the site is highly likely to have high levels of contamination with further investigation and remediation necessary to develop the site for other means.</li></ul> |
| <p><b>IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?</b></p>  |   |
| <p>The two closest defined 'town centres' to the fruit wholesale market site are the city centre and Totterdown. The route to Totterdown comprises Albert Road, a bridge over the River Avon and then the increasingly steep Summer Hill and Bathwell Road. This route, starting from the existing entrance to the fruit wholesale site, extends to circa 780 metres.</p> <p>The closest part of the city centre boundary to the fruit wholesale site is where Albert Road crosses over the floating harbour. The route via Albert Crescent from the existing site entrance to this point extends to circa 850 metres whilst the route via Albert Road is circa 1,100 metres. The distance to the defined primary shopping area is greater still and therefore whether the classification is measured in terms of either retail or leisure land uses, the fruit wholesale market site lies in a clear out of centre location.</p> <p>We have therefore gone on to consider whether this out of centre site better connected and more accessible in relation to 'town centres' than the Brabazon Hangar site. This assessment has been undertaken with the assistance of Hydrock whose analysis highlights the following:</p> <ul style="list-style-type: none"><li>• In terms of walking and cycling connectivity, the fruit market site is closer to Totterdown than the Brabazon Hangars are to Filton. However, the route to Totterdown involves a steep change</li></ul> |   |

- in levels which would discourage linked trips. Therefore, this will not provide a more accessible and better connected location.
- At the present time the fruit wholesale market is closer to a railway station (Temple Meads) than the Brabazon Hangar site. Improvements are also planned to Temple Meads which will improve access to the station from the east. However, the walking distance to Temple Meads is still significant and is very unlikely to be appropriate for trips to the proposed use. Therefore, based upon the current situation, the fruit wholesale market is not more accessible in terms of rail journeys. As they crow flies' the fruit market would appear close to temple meads railway station, however the walking route is indirect and unattractive. It is clearly not the sort of walking route which would be encouraged or supported in relation to a land use which attracts a large number of people. The fruit market site lies adjacent to a railway line but it is not served by a significant public rail services and cannot provide easy connections to temple meads.
  - However, when the planned new rail station at Filton is included in the analysis, the Brabazon Hangars site will be circa 500 metres from a rail station, thus making it clearly more accessible than the fruit wholesale market in relation to connectivity with Bristol city centre.
  - In relation to accessibility to bus services, both sites lie a similar distance to the nearest stops and these stops are served by frequent services. Based upon the existing situation, the ease of walking between either site and the nearest stop marginally favours the fruit wholesale market although when the planned infrastructure for the arena and filton airfield developments is taken into account then any difference in terms of route to existing stops is eliminated. However, most importantly, the proposed arena use will lie directly adjacent to the MetroBus route which will provide easy and frequent access to Bristol city centre and therefore gives it a significant advantage in terms of accessibility and connectivity over the fruit wholesale market. The fruit market site has no such advantage.
  - Therefore, based upon the planned transport improvements in and around the Filton Airfield area, it is reasonable to conclude that the Brabazon Hangars site is more accessible and better connected to Bristol city centre, and also arguably other defined 'town centres', in the local area. Therefore the fruit wholesale market can be discounted from the sequential site assessment.

#### IS THE SITE A SUITABLE ALTERNATIVE?

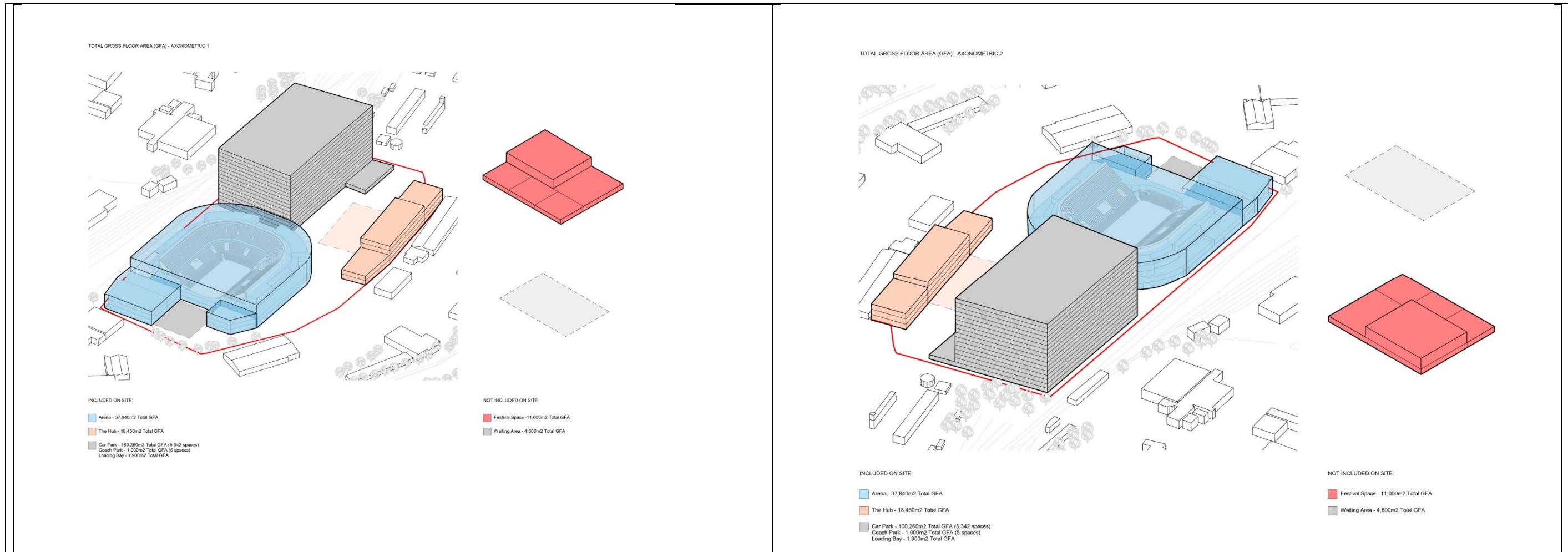
Given that the fruit wholesale market site does not have any sequential advantage over the Brabazon Hangar site, there is no need to consider its suitability and availability. However, we have done so on a without prejudice basis in order to provide a robust assessment.

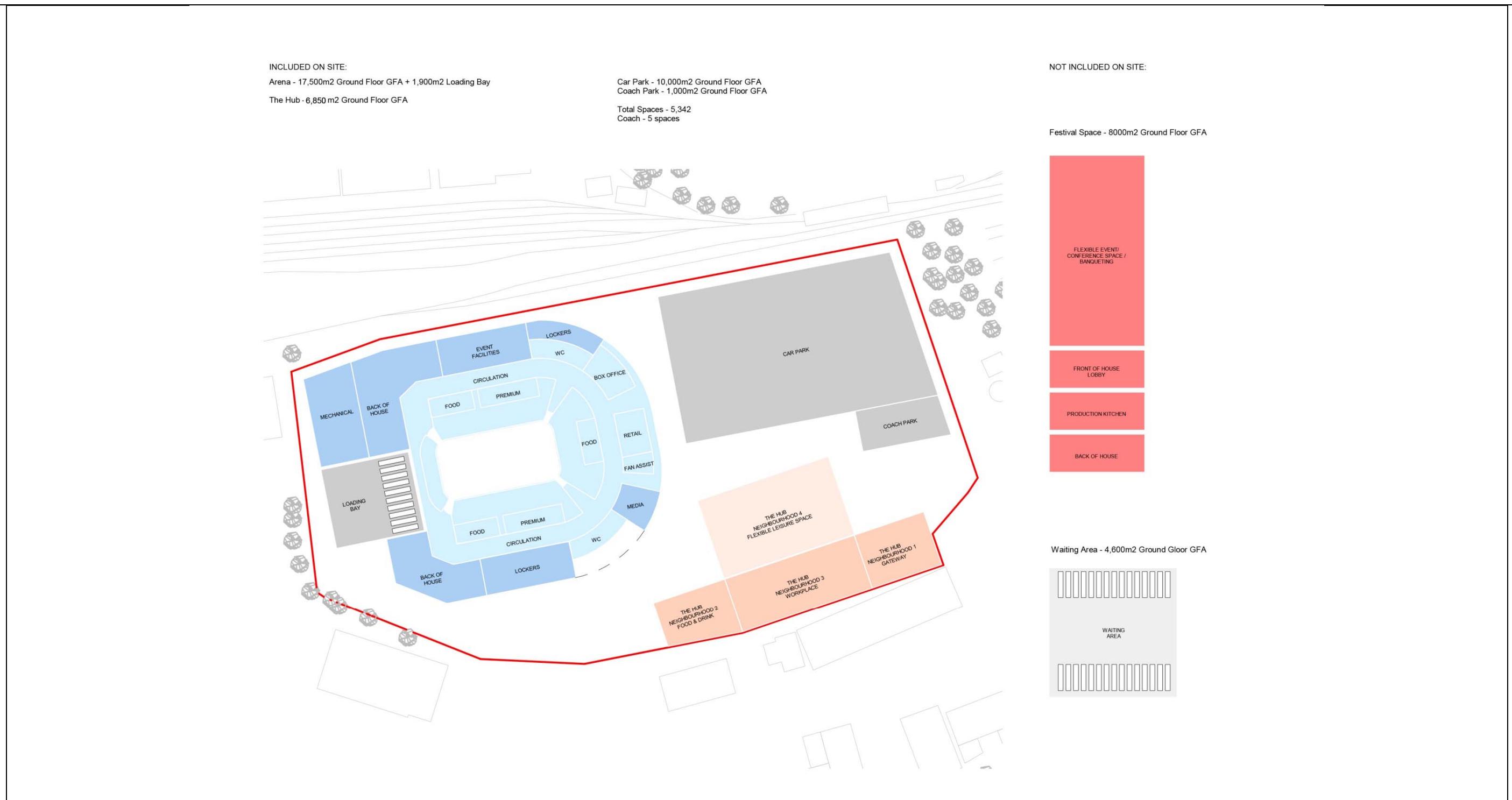
In terms of planning policy status, both sites attract the same Principal Industrial and Warehousing Areas status in the development plan. Given this status and each site is being tested for the same use, there cannot be any differentiation in terms of the first part of DM13. However, there could be a difference in terms of the second part of DM13 given that the fruit wholesale market site is in full and active use whereas the Brabazon Hangar site is not an attractive location for industrial and/or warehouse given the site and building characteristics.

Grimshaw have undertaken a feasibility study to establish which elements of the proposal can be accommodated on the fruit wholesale market site and these are shown below. The feasibility has been prepared on the following basis:

- The site is not in the city centre, and has poor accessibility, and therefore needs to provide sufficient on-site car parking to meet appropriate demand. Based upon the demand levels proposed by BCC for the Temple Island arena proposal (12,000 capacity), and increased pro-rata to allow for a 17,000 capacity arena, this would require a multi-storey car park of circa 5,500 spaces.
- The Hub and Festival Space require separate ground floor accommodation due to the nature of these uses, along with separate ground floor accommodation for the arena auditorium element. This is because each element has significant servicing requirements which require ground HGV access including (A) a significant number of HGVs associated with touring entertainment acts, and (B) servicing for large scale concerts, events and exhibitions within the Festive Space.
- In order to provide adequate servicing etc, there is a need for separate loading areas (adjacent to the arena auditorium building) and a coach parking/waiting area.

The diagrams prepared by Grimshaw show that, based upon the above, a broadly similar development cannot be accommodated on the fruit wholesale market site. The 17,000 capacity arena auditorium can be accommodated along with the large multi-storey car park and Hub, but not the Festival Space or the required coach parking/waiting area. The degree of flexibility which can be achieved in this location is limited due to the requirement for sufficient car parking spaces and any reduction in the size of the arena auditorium and Hub areas in order to accommodate the Festive Space would fundamentally change the type of proposal and lead to it being materially different from the proposal at the Brabazon Hangar site.





Finally in relation to suitability, the provision of the proposal on the fruit wholesale market site would appear to be inappropriate out of centre location in terms of the surrounding land uses. St Philip's Marsh is very much an industrial and warehousing area whose success is built upon the co-location of the existing uses. This is in contrast to Brabazon Hangar site where the circumstances are significantly and materially different, where a wide range of mixed use development will be implemented over the coming years including many main town centre uses.

#### IS THE SITE AN AVAILABLE ALTERNATIVE?

We understand that this site is in a single ownership: Wholesale Fruit Centre (Bristol) Limited. However, there are multiple units within the site subject to 99 year leases from 1968. In addition, there is no evidence to suggest that the site can be made available for redevelopment for the proposal within a reasonable period of time.

#### CONCLUSION

The fruit wholesale market site can be discounted from the sequential site analysis on the basis of the following:

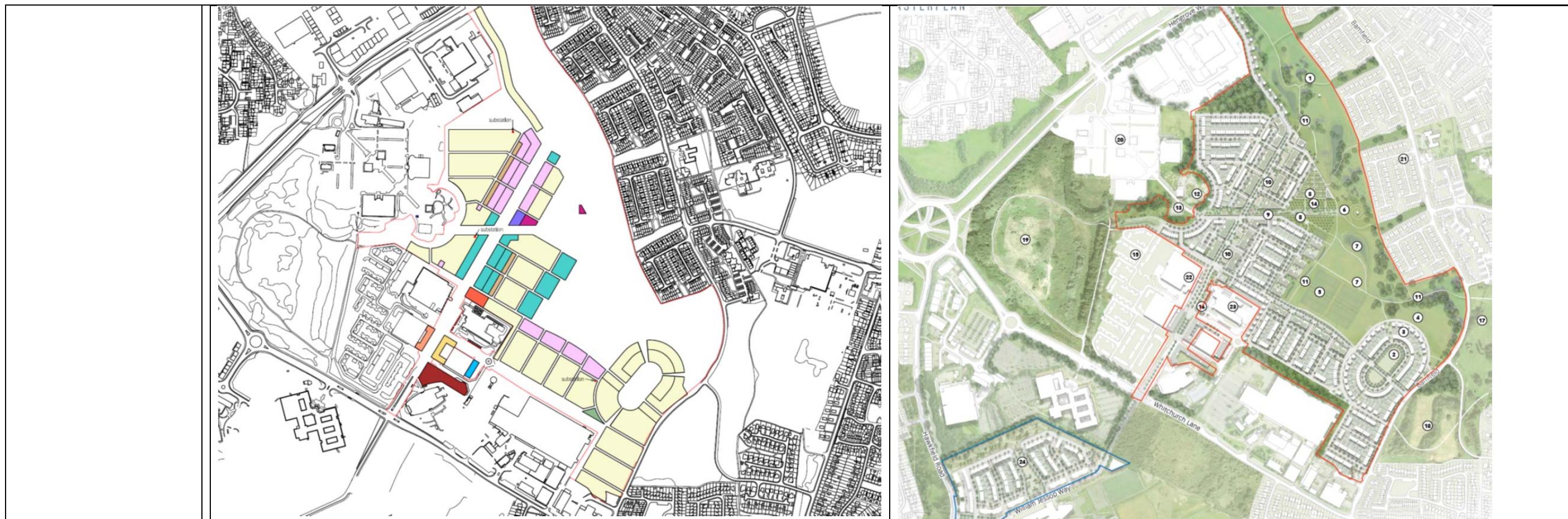
- This is an out-of-centre location which is not better connected and/or more accessible to nearby 'town centres' than the Brabazon Hangar site. Therefore, there is no requirement to consider whether it offers a suitable and available alternative to the application site.
- Even when the issues of suitability and availability are considered, it is clear that (A) the fruit wholesale market site cannot accommodate a broadly similar type of development as proposed at the Brabazon Hangar site, and (B) the site is not available for redevelopment for the proposed development within a reasonable period of time.

# Appendix IV

## Hengrove Park

|                         |   |                                 |  |
|-------------------------|---|---------------------------------|--|
| <b>SITE REFERENCE:</b>  | <b>51</b>   | <b>SITE NAME:</b> Hengrove Park |  |
| <b>SITE DESCRIPTION</b> |   |                                 |  |
| Location                | Hengrove Park, Hengrove Way, Bristol  |                                 |  |
| Site size               | 49.7 ha   |                                 |  |
| Current land uses       | Open Space  |                                 |  |
| Adjoining land uses     | The site is surrounded by a mixture of uses. To the north-west an array of leisure, employment, and light industrial warehousing uses are present. To the east the existing residential estate off Barnfield. To the west 'The Hengrove Mounds' a nature reserve, and immediately to the south lies further community uses including the Hengrove Leisure Centre, South Bristol Community Hospital, City of Bristol Skills Academy and creative Bottle Yard studios.  |                                 |  |
| Planning policy status  | <p>This site is allocated in the development plan for residential, office and open space.</p> <p>The relevant adopted local policies are set out in the Bristol Local Plan Core Strategy (2011); and the Development Management Policies (2014)</p> <p><u><a href="#">Bristol Local Plan Core Strategy (2011)</a></u></p> <p>Policy BCS1 - South Bristol will be a priority focus for development and comprehensive regeneration. Development will be for a mix of uses to include:</p> <ul style="list-style-type: none"> <li>- Around 60,000m<sup>2</sup> of net additional office floorspace focused on centres and the major regeneration areas;</li> </ul> |                                 |  |

|                                       |   |
|---------------------------------------|---|
|                                       | <ul style="list-style-type: none"><li>- Up to 10 hectares of new industrial and warehousing land focused on the major regeneration areas;</li><li>- The provision of around 8,000 new homes of a mix of type, size and tenure.</li></ul> <p>Development will occur across South Bristol with major regeneration particularly focused on the area at Hengrove Park and Knowle West. Regeneration in this area will require redevelopment of poor quality urban form in some locations to support the creation of higher quality environments. Development will be supported by a range of improvements to key public services and infrastructure which will include provision of:</p> <ul style="list-style-type: none"><li>- Community hospital, Skills Academy, Healthplex, leisure facilities and outdoor recreation located at Hengrove Park;</li><li>- Improvements in the quality of open space and to the green infrastructure network as a whole.</li></ul> <p>Major improvements to transport infrastructure will be made to enhance links between existing communities within South Bristol, and between South Bristol, the city centre and the north of the city. Improvements will have an emphasis on pedestrian, cycling and public transport facilities and will include:</p> <ul style="list-style-type: none"><li>- Rapid transit routes connecting Hengrove with the north fringe of the Bristol urban area via the city centre;</li><li>- Extended Showcase bus corridors on the A37 and A4;</li><li>- Reshaped pattern of roads and junctions to improve accessibility, connectivity and urban form and to reduce severance within South Bristol;</li><li>- Safe routes for pedestrians and cyclists; and</li><li>- Essential transport links and improvements.</li></ul> <p><u>Bristol Local Plan Site Allocations and Development Management Policies (2014)</u></p> <p>The site is allocated (Ref: BSA1401) for housing, offices and open space in the form of a large high quality park.</p> <p>Hengrove Park is the largest regeneration site in the city with long-identified potential to be the centrepiece of a transformed South Bristol. It provides the opportunity to reinforce the success of Phase 1 of the Park's regeneration. As well as a mix of new homes and businesses, the allocation will provide a large high quality park. This park will be in addition to the 15 hectares of open space safeguarded at 'The Mounds' adjacent to the west of the site and the 13 hectares of open space to be retained either side of Briery Leaze Road adjoining the east of the site.</p> <p>It reflects the priority given in the Core Strategy to the regeneration of South Bristol through additional mixed-use development and the provision of new employment opportunities. It will significantly contribute to meeting the Core Strategy minimum target of providing 26,400 new homes in the period 2006-2026.</p> <p>Within the recently 'made' Neighbourhood Plan, the site is allocated for open space and a large number of new homes.</p> |
| Planning Application Relevant History | An outline planning application was submitted in June 2018 (Planning Ref: 18/03537/PB) for the following:<br><i>Outline application for the demolition of existing buildings on site and regeneration of 49ha of land comprising residential development of up to 1500 dwellings (Class C3); up to 4515sqm of office accommodation (Class B1a); up to 4500sqm of education floor space to enable the expansion of City of Bristol College Skills Academy (Class D1); up to 790sqm community building (Class D1/D2); up to 2440sqm of flexible commercial floor space (Classes A1, A2, A3, A4, A5 and D1). Provision of new park of approximately 19ha, and areas of formal and informal open space. Transport infrastructure comprising connections to Hengrove Way, Bamfield, Hengrove Promenade and The Boulevard, and creation of new footways and cycleways. Access and strategic landscaping to be determined with all other matters reserved.</i>   |



The proposal includes 2,400sq m of Class A1-5 retail and Class D1 uses, including up to 1,500sq m of Class A uses. The Class A and D uses are proposed to be provided adjacent to the existing leisure centre and hospital uses in the south-western part of the application site.

BCC refused to grant outline planning permission in March 2019 although a subsequent application later in 2019 has now gained Council support.

|             |   |
|-------------|---|
| Constraints | <p>Flood Risk</p> <ul style="list-style-type: none"><li>- The site is solely situated within Flood Zone 1.</li></ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- Hengrove Park is covered by the Hengrove Park Wildlife Corridor designation. It is not in or nearby to a conservation area and there are no listed buildings in the proximity.</li><li>- There are also a number of ecological designations within the immediate locality including The Mounds SNCI to the west, Briery Leaze SNCI to the east and Airport Road SNCI to the north.</li><li>- The Mounds was a former landfill that has been re-colonised with vegetation and has developed locally to regionally significant biodiversity.</li><li>- The former airport has been classified as a non-designated heritage asset within the application site. The remains of the airport include the concrete runway in the centre of the site, the former taxiway towards the site's eastern extent and a likely barrage balloon tether located directly to the north of the former athletics track.</li></ul> <p>Ground</p> <ul style="list-style-type: none"><li>- There remains large areas of tarmac surfacing at the centre of the site, which is remnant of the former Whitchurch Municipal Airport areas which closed in 1957 and then conversely landscaped and reverted to a recreational area. It is therefore likely contamination via made ground is present subject to further intrusive investigation.</li></ul> |
|-------------|---|

#### IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?

The nearest defined 'town centre' to Hengrove Park is Whitchurch district centre. The nearest part of the Hengrove Park site to the western edge of the district centre is circa 400 metres away making it an out of centre location. On this basis, it is therefore necessary to consider whether Hengrove Park is more accessible and better connected to a 'town centre' than the Brabazon Hangar site.

Based upon the analysis undertaken by Hydrock, the following information is salient:

- Both sites will lie on MetroBus route M1. Hengrove will lie at the start and end of the main route, whilst the Airfield will lie on a spur which will also serve Bristol Parkway railway. It is therefore considered that both sites are equal in terms of their public transport accessibility in relation to Bristol city centre.
- The Brabazon Hangar site will have materially better accessibility to Bristol city centre than Hengrove Park via train given the new committed station adjacent to the site. The nearby train station to Hengrove Park can be found at Parson Street.
- Whilst Hengrove Park will have better walking and cycling accessibility to its nearest lower order centre (Whitchurch), there is no material difference between the two sites in relation to the city centre.

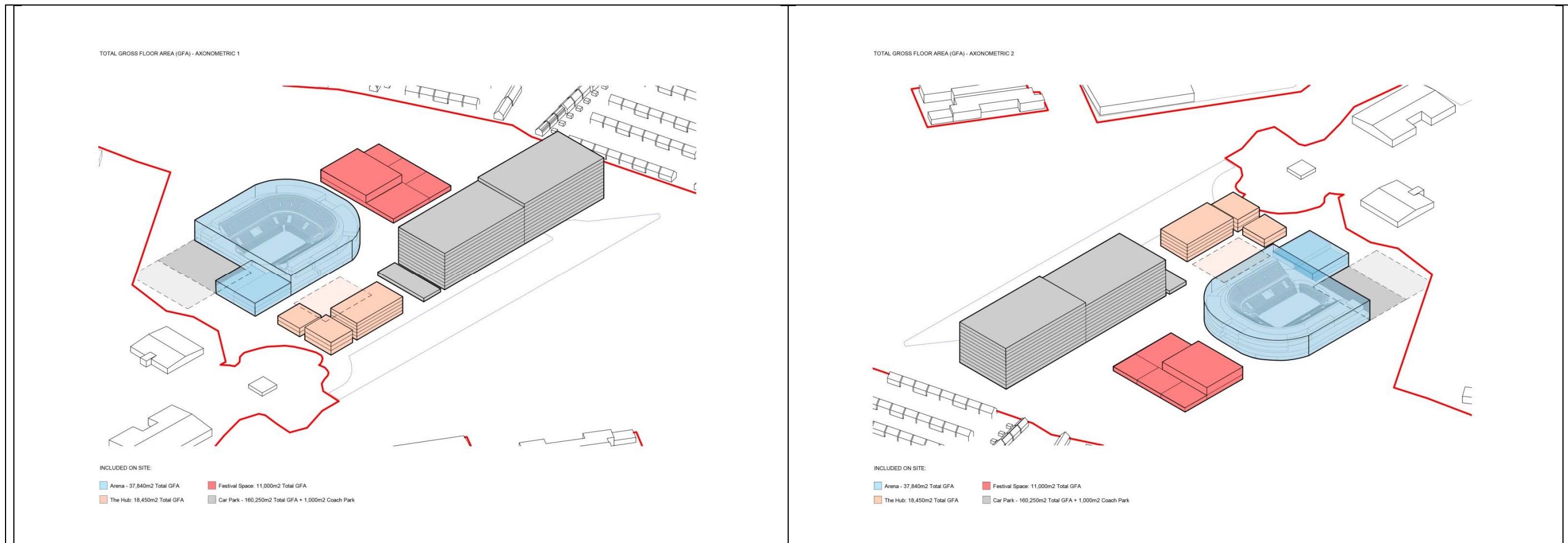
As a consequence of the above, we consider that the Brabazon Hangar site is, overall, more accessible and better connected to Bristol city centre than the Hengrove Park site. Therefore, there is no requirement to consider whether Hengrove Park offers a suitable and available alternative for the proposed development.

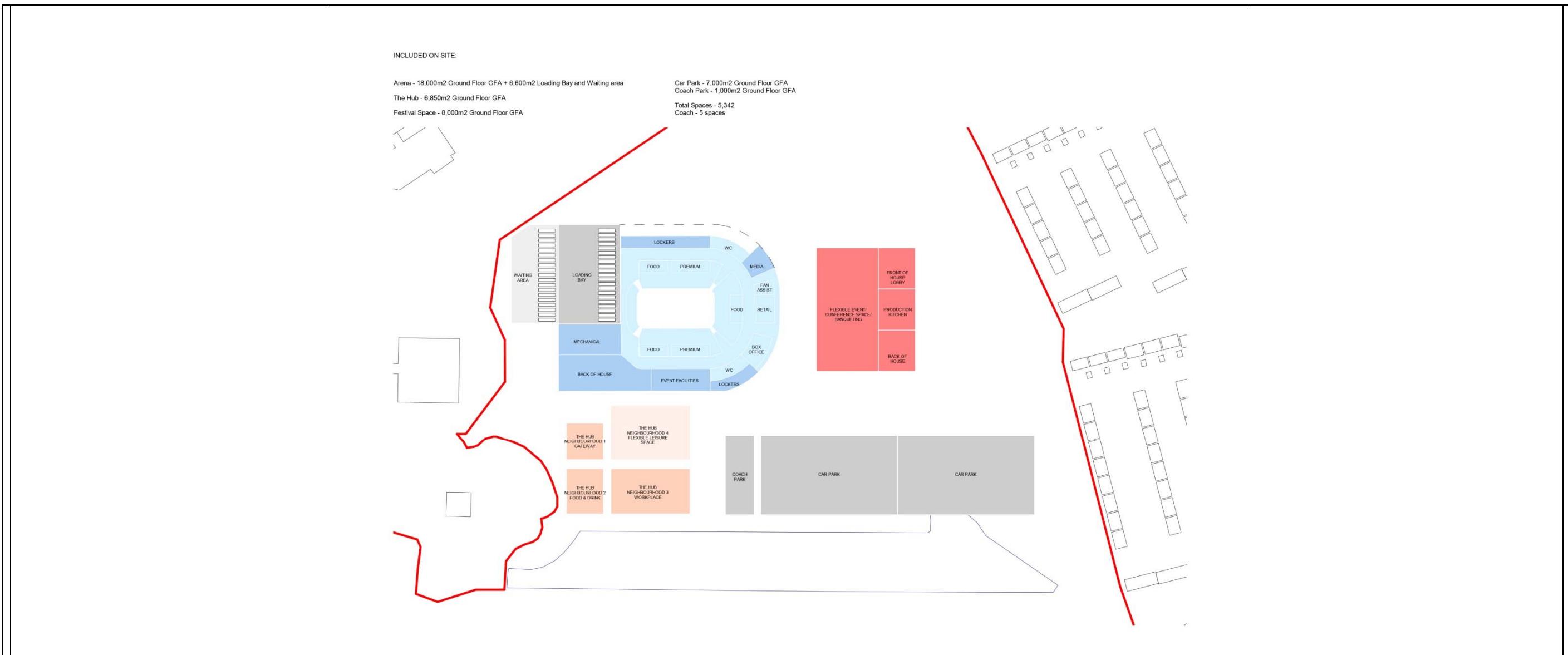
#### IS THE SITE A SUITABLE ALTERNATIVE?

Whilst there is no formal requirement to consider whether Hengrove Park is a suitable and available alternative for the proposal, we have undertaken such an assessment on a without prejudice basis.

The plans and diagrams prepared by Grimshaw below show that in physical terms all elements of the proposal can be accommodated. However, they would remove the ability to provide a significant amount of the planned residential development on this site which will affect BCC's ability to deliver the required number of new residential units in South Bristol, which is likely to be unacceptable in planning policy terms.

In addition, the provision of large scale leisure and retail uses on Hengrove Park would not conform to the provisions of the development plan strategy for this site and South Bristol.





#### IS THE SITE AN AVAILABLE ALTERNATIVE?

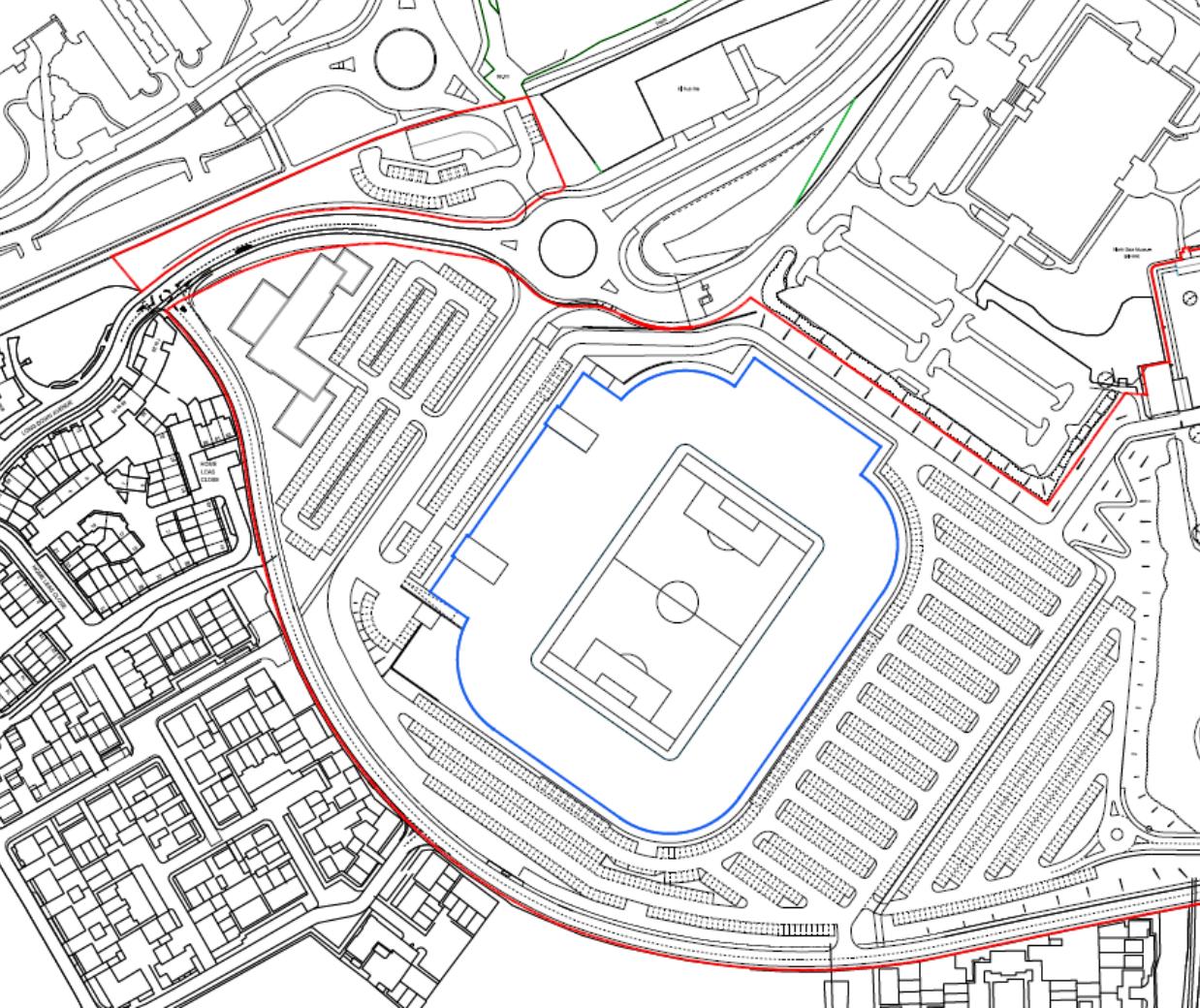
Given the allocation of this site in the development plan and given the current outline planning application, it is reasonable to assume that Hengrove Park is generally available for redevelopment. However, given the content of the current outline planning application, it is clear that Hengrove Park is not available for the proposal.

#### CONCLUSION

Hengrove Park provides one of the most strategically important development sites in Bristol. However, it is not located in a sequentially preferable location to the Brabazon Hangar site and, in any event, it is not a suitable and available alternative for the proposal.

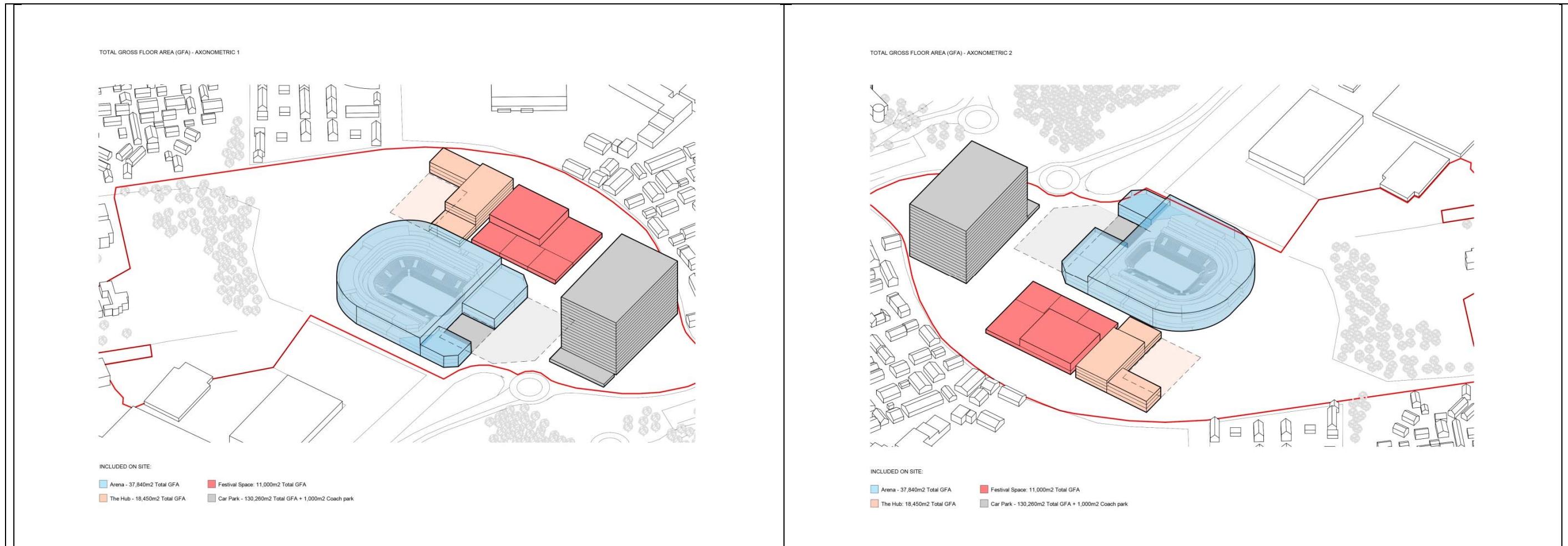
# Appendix V

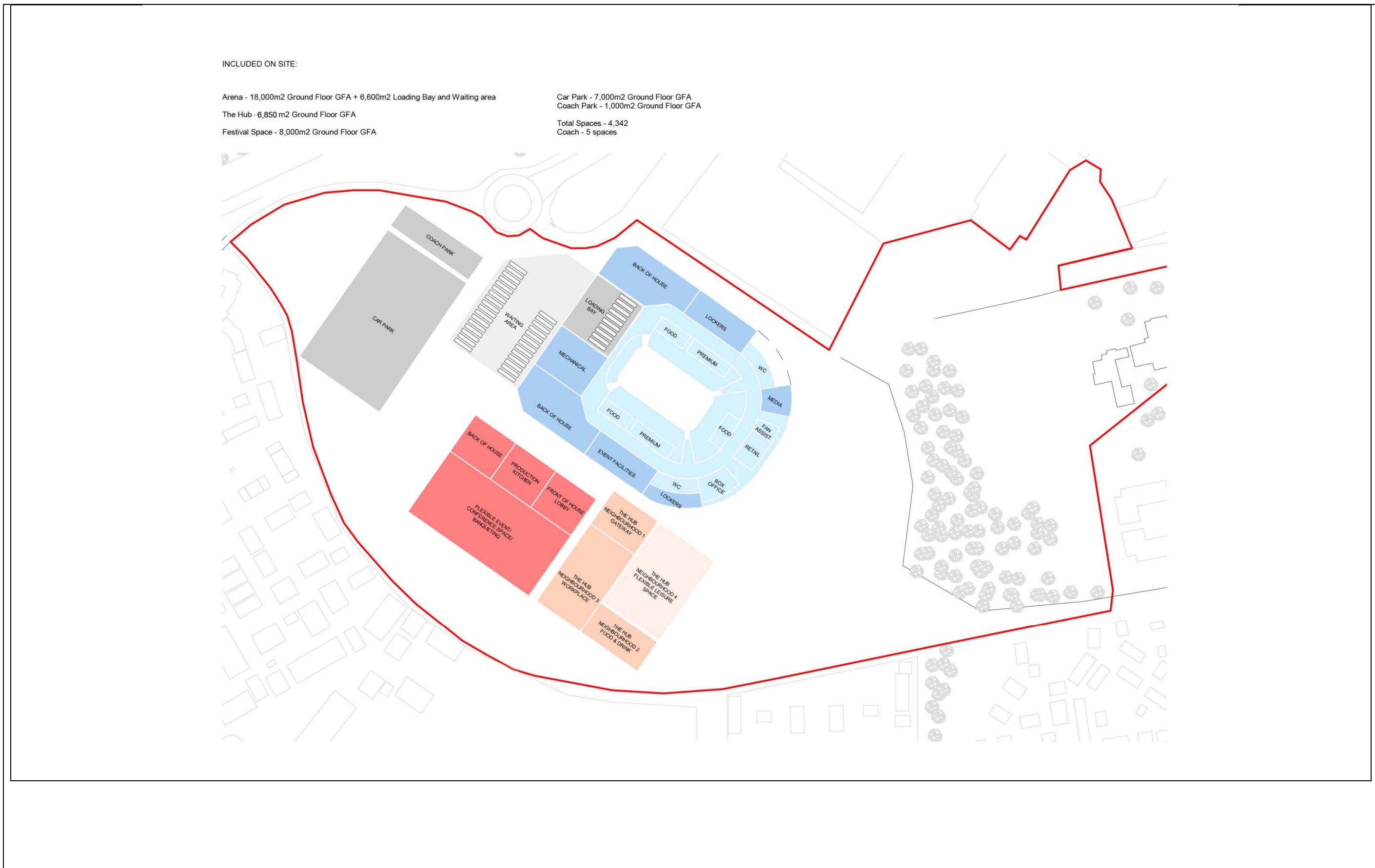
## Proposed UWE Stadium Site

|                        |    |  |  |
|------------------------|----|--|--|
| <b>SITE REFERENCE:</b> | 53 | <b>SITE NAME:</b> UWE Stadium, Stoke Gifford |  |
|------------------------|----|--|--|

| <b>SITE DESCRIPTION</b>               |   |
|---------------------------------------|---|
| Location                              | University Of West Of England, Coldharbour Lane, Stoke Gifford, Bristol.  |
| Site size                             | 8.2 hectares  |
| Current land uses                     | Greenfield  |
| Adjoining land uses                   | The site is surrounded predominantly by a mixture of employment uses which include DE&S MOD Abbey Wood, HPE Bristol, HPI Bristol, DXC Bristol, and UWE Frenchay Campus. The site is also bordered to the south by the Wallscourt Farm an existing new build residential development being delivered by Redrow Homes.  |
| Planning policy status                | <p>Allocated in the development plan.</p> <p><u><a href="#">South Gloucestershire Policies, Sites, and Places Plan – Part II: Sites &amp; Places (2017)</a></u></p> <p>Under PSP47 – Site Allocations &amp; Safeguarding this site is designated under the sub section Sports &amp; Leisure PSP47(15) for the provision of the UWE stadium for a 21,700 seater sports stadium, ancillary and educational facilities.</p>  |
| Planning Application Relevant History | <p>The site falls part of an existing consented development (Ref: PT12/3809/O) for the following:</p> <p><i>'Erection of new buildings on 55.1 hectares of land for; academic, recreation, administration and support purposes (44,055m<sup>2</sup>, Use Class D1); student residential and associated welfare facilities (30,790m<sup>2</sup>, sui generis use); 15,200m<sup>2</sup> of mixed commercial uses, consisting of a Hotel (200 bedrooms [6,000m<sup>2</sup>, Use Class D1], Restaurant/Public</i></p> |

|  |  |
|--|--|
|  | <p><i>House/Hot Food Take-away (1,200m<sup>2</sup> Use Classes A3/A4/A5); Office/Research and Development (8,000m<sup>2</sup>, Use Class B1a/B1b); associated infrastructure including provision of a new public transport hub, 2 no. decked and at grade car parks, landscaping, internal highway realignment, amendments to 2 no. adopted vehicular access points; and the demolition of 7,330m<sup>2</sup> existing buildings. Outline application with all matters reserved except access'.</i></p> <p>Note: The majority of the above consent has now been delivered to include the Wallscourt Park Residences, Student Union, and UWE International College. Notably in relation to stadium and the deal between Bristol Rovers FC and UWE Stadium collapsed in August 2017 following both parties reaching an impasse with Bristol Rovers FC pulling the plug on the project. It is unknown as to whether the UWE Stadium will ever be built as part of the consented scheme.</p> |
| Constraints  | <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- The site is not covered by any statutory or non-statutory conservation area designations. In terms of wider biodiversity the site is bordered to the north and south by sites of Nature Conservation Interest designated under Policy PSP19 as shown on the interactive policies map.</li><li>- The site is within close proximity to two listed buildings designated under Policy PSP17. One is situated to the west neighbouring the Wallscourt Park Residences otherwise known as Wallscourt Farmhouse on UWE Frenchay Campus, and the other to the east situated within the curtilage of the DE&amp;S MOD Abbey Wood (South) car parking directly above the Ashley Down Old Boys Rugby Football Club.</li></ul>   |
| <b>IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?</b>   |  |
| <p>The nearby defined 'town centre' in South Gloucester is the new centre at Stoke Gifford to the north. The route to the defined 'town centre' boundary is circa 700 metres and a further 200 metres to the defined primary shopping area. The nearest centre in the BCC administrative area to the south is Lockleaze, at 1.1km away. Therefore, the UWE stadium site can be considered to be an out-of-centre location and consideration should be given to whether it is more accessible and better connected to nearby 'town centres' and Bristol city centre than the Brabazon Hangar site.</p> <p>An analysis of these issues undertaken by Hydrock has found the following:</p> <ul style="list-style-type: none"><li>• The UWE stadium site lies, at the present time, closer to bus stops than the Brabazon Hangar site. Services 70 and 71 call at these stops and offer a regular service which links to Bristol city centre. A large number of services serve the UWE campus which is a slightly lower walk away which is broadly comparable to the walk from the Brabazon Hangar site to a similar wide array of services travelling along Gloucester Road.</li><li>• MetroBus services visit the UWE campus site, which is a 750 metre walk from the UWE stadium site. The Airfield will be served by the Cribbs Patchway MetroBus extension which will be a shorter distance from the Brabazon Hangar site.</li><li>• Overall, there is little to differentiate these two sites in terms of their accessibility via bus services across Bristol and the connectivity to Bristol city centre.</li><li>• There will be material difference, however, in terms of accessibility and connectivity to Bristol city centre via rail services. There is a significant walking distance between the UWE stadium site and Parkway station. Such a distance will not exist when the new railway station adjacent to the Airfield and Brabazon Hangar site opens.</li></ul> <p>Overall, whilst there is little difference in terms of bus services, the provision of a new rail station adjacent to the Airfield site means that it is more accessible and better connected in relation to Bristol city centre than the UWE stadium site. As a consequence, the UWE stadium site does not offer any sequential advantage over the Brabazon Hangar site and there is no need to consider its suitability and availability.</p> |  |
| <b>IS THE SITE A SUITABLE ALTERNATIVE?</b>   |  |
| <p>Whilst there is no need to formally consider whether the UWE stadium site can offer a suitable and available alternative to the Brabazon Hangar site, we have undertaken an assessment on a without prejudice basis.</p> <p>The diagrams below prepared by Grimshaw show that the site can accommodate all elements of the proposal including sufficient multi-storey car parking provision. However, the development plan allocation requires an alternative form of development which is incompatible with the arena proposal and therefore the UWE stadium site is not a suitable alternative.</p>   |  |





#### IS THE SITE AN AVAILABLE ALTERNATIVE?

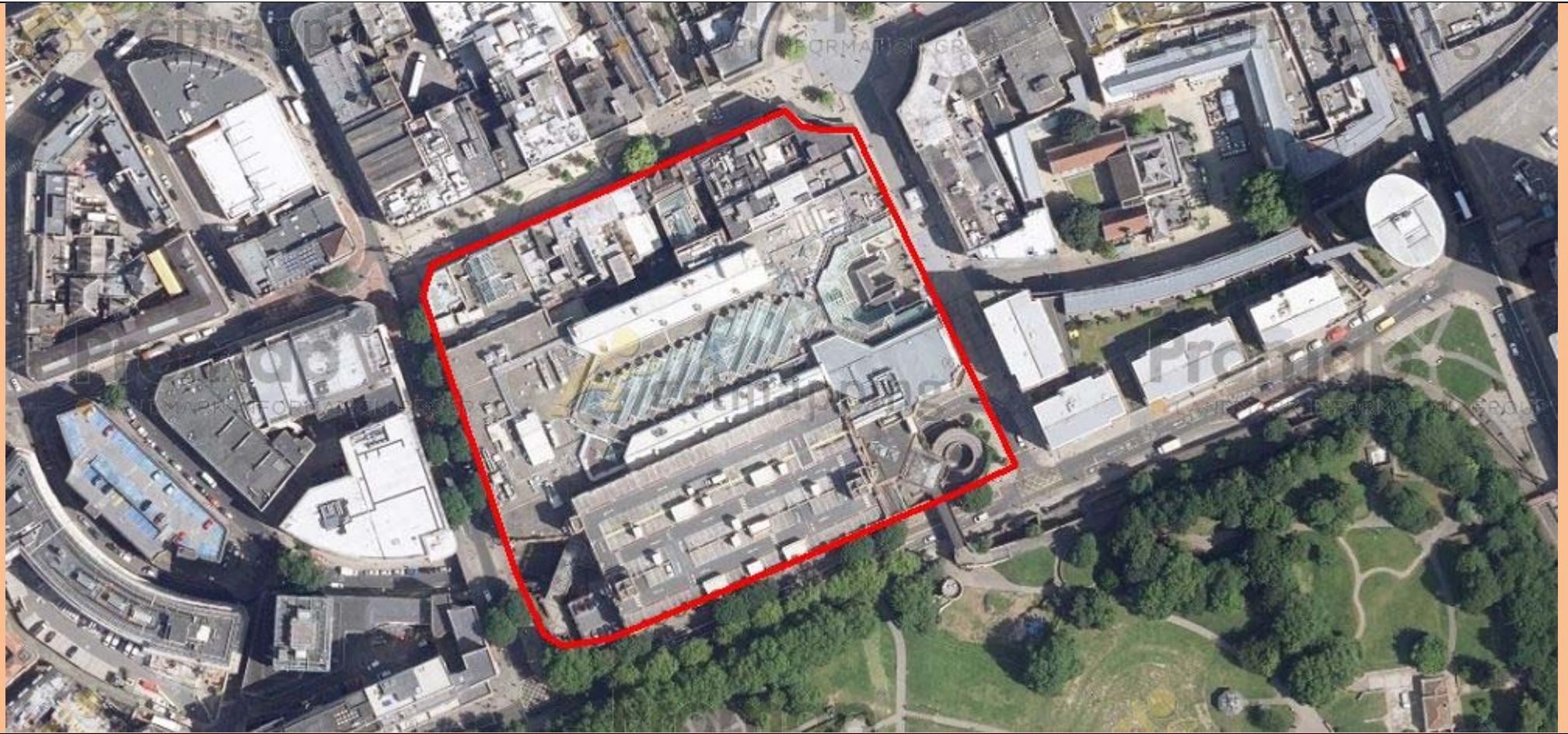
This site is vacant, attracts a development plan allocation for redevelopment and has been subject in the recent past to a planning application proposing new development. Therefore, on face value, this site is generally available. However, following the collapse of the UWE stadium plans with Bristol Rovers FC, UWE has not public stated its intentions in terms of next steps.

#### CONCLUSION

The UWE stadium site is large enough in principle to accommodate all relevant elements of the proposal, and have previously been considered to be available for development. However, this site can be discounted from the sequential site assessment as it does not provide a sequentially preferable alternative location to the Brabazon Hangar site and, in planning policy terms, it is not a suitable alternative.

# Appendix VI

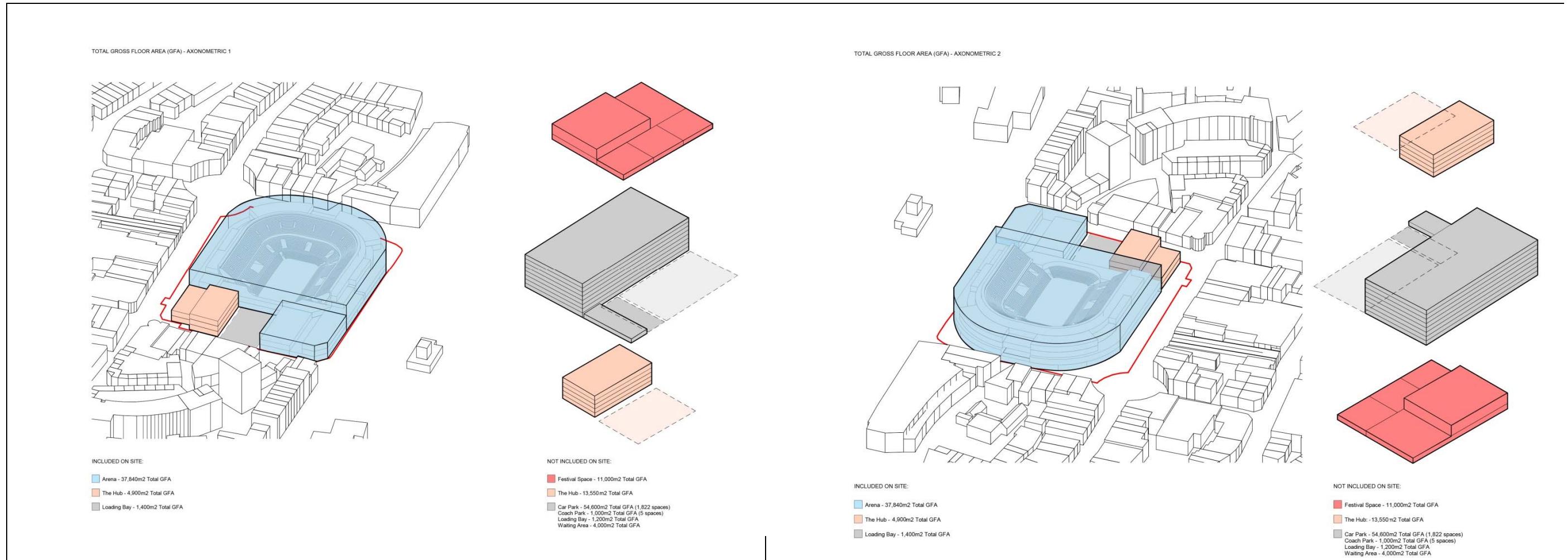
## The Galleries, Broadmead

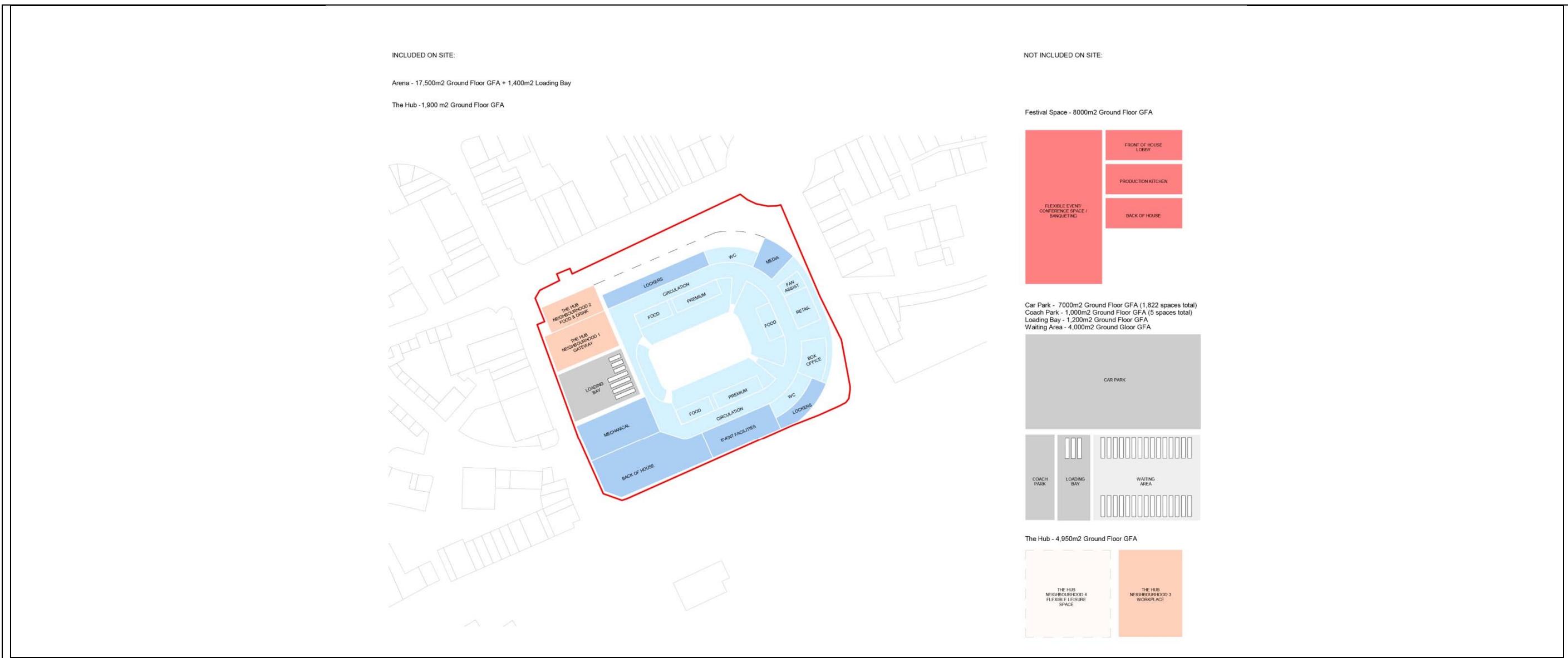
|                         |   |  |   |
|-------------------------|---|--|---|
| <b>SITE REFERENCE:</b>  | <b>65</b>   | <b>SITE NAME:</b> The Galleries, Broadmead |  |
| <b>SITE DESCRIPTION</b> |   |  |   |
| Location                | The Galleries, 25 Union Gallery, Broadmead.   |  |   |
| Site size               | 2.4ha. For the purposes of this assessment we have adopted the whole of the area between Broadmead, Union Street, Newgate and Merchant Street.  |  |   |
| Current land uses       | The Galleries is currently an enclosed shopping mall with a high proportion of Use Class A1 retail shopping uses. There are also retail units on the western, northern and eastern edges of this site.  |  |   |
| Adjoining land uses     | The site is centred within the Bristol Shopping Quarter and is surrounded by a mixture of existing uses which comprises of mainly retail, with elements of leisure, and office employment dispersed within. To the north comprises the remainder of Broadmead Shopping Centre, to the east Cabot Circus Shopping Centre, to the south Castle Park, and to the west other retail units situated off Union Street.  |  |   |
| Planning policy status  | <p>This site lies within Bristol city centre and within the defined primary shopping area for the centre. In addition, Broadmead, Merchant Street and Union Street are defined primary shopping frontages.</p> <p>The relevant adopted local policies are set out in the Bristol Local Plan Core Strategy (2011); Development Management Policies (2014); and the Bristol Central Area Plan (2015).</p> <p><u><a href="#">Bristol Local Plan Core Strategy (2011)</a></u></p> <p>Policy BSC7 identifies retail development, offices, leisure and entertainment uses, arts, culture and tourism uses which will be primarily located within or, where appropriate, adjoining the centres in the identified network and hierarchy serving Bristol. Broadmead Shopping centre falls within the hierarchy of centres within the city centre with retail shop uses predominate in this designated primary shopping area.</p> |  |   |

|  |  |
|--|--|
|  | <p><u>Bristol Local Plan Site Allocations and Development Management Policies (2014)</u></p> <p>Policies within the Development Management Policies that are particularly relevant to any development proposal are as follows:</p> <p>Policy DM8: Shopping Areas and Frontages. Proposals for development within the city centre will be assessed against the relevant policies of the Bristol Central Area Plan. Within this Primary Shopping Area identified on the Policies Map (BCAP 13) development will be expected to maintain or provide active ground floor uses.</p> <p>Within Primary Shopping Areas change of use of shops (Use Class A1) to another use will not be permitted unless the proposed use would:</p> <ul style="list-style-type: none"><li>- Make a positive contribution to the vitality, viability and diversity of the Primary Shopping Area and centre;</li><li>- Not fragment any part of the Primary Shopping Area by creating a significant break in the shopping frontage;</li><li>- Not result in a loss of retail floorspace of a scale harmful to the shopping function of the centre;</li><li>- Be compatible with a retail area in that it includes a shopfront with a display function and would be immediately accessible to the public from the street.</li></ul> <p><u>Bristol Local Plan – Bristol Central Area Action Plan (2015)</u></p> <p>Policy BCAP13: Strategy for retail development in Bristol City Centre. Bristol Shopping Quarter forms the core of Bristol City Centre's retail offer. It comprises the city's principal shopping area including Cabot Circus, Broadmead and The Galleries and is the largest retail destination in South West England. It is the principal and preferred focus for major retail development in the Central Area Plan.</p> <p>Aside from the above Policy BCAP36: Bristol Shopping Quarter details major new retail developments and the retention of retail dominated primary shopping frontages, the offer in Bristol Shopping Quarter will be strengthened and diversified with a wider range of uses, including a greater proportion of leisure uses such as cafes, restaurants, pubs and bars within the shopping areas (Policies BCAP16 and BCAP19). The use of currently unused upper floors for new homes or specialist student accommodation will be strongly encouraged.</p> <p>Notably, retail growth in the city centre will be focused on the Bristol Shopping Quarter Primary Shopping Area through the redevelopment of underused sites and buildings, particularly at The Horsefair/Callowhill Court and at Union Street (Policy Map Site KS02). This site is allocated for major retail-led mixed use redevelopment and may include a proportion of leisure uses as appropriate to the Bristol Shopping Quarter Primary Shopping Area. This is immediately adjacent to The Galleries to the west.</p> |
| Constraints  | <p>Flood Risk</p> <ul style="list-style-type: none"><li>- The site is situated within Flood Zone 2.</li></ul> <p>Air Quality</p> <ul style="list-style-type: none"><li>- The site has the potential for significant emissions to the detriment of air quality. The site is located within the city's Air Quality Management Area (AQMA), which broadly covers the city centre and main arterial routes leading into the city. The AQMA has poor nitrogen dioxide levels.</li></ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- On the northern boundary of the Galleries Shopping Centre is No. 1-2 Union Gallery. Formerly known as 67, 69, &amp; 71 The Greyhound Hotel this building is Grade II listed.</li><li>- On the eastern boundary of the Galleries Shopping Centre is No. 19-21 Merchant Street. Formerly known as Merchant Taylors Almshouses this building is Grade II* listed.</li><li>- The site has an important area of open space immediately to the south otherwise known as Castle Park which is designated as an important area of open space on the Bristol Central Area Action Plan policies map.</li><li>- Within Castle Park St Peter's Ruin sits a Grade II* Listed Church which falls within the City and Queen's Square Conservation Area where it makes a positive contribution to this local/wider setting and appearance.</li></ul>   |
| <b>IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?</b>   |  |
| Given the location of this site within the city centre boundary and the primary shopping area boundary, it is considered to be an in-centre site for the purposes of the sequential test and therefore to lie in a sequentially preferable location to the Brabazon Hangar site. |  |

## IS THE SITE A SUITABLE ALTERNATIVE?

Whilst it is likely that the removal of a significant amount of Class A1 retail floorspace from the primary shopping area and primary shopping frontages is likely to be contrary to Policy BCAP16 of the Bristol Central Area Plan and Policy DM8 of the Site Allocations and Development Management Policies Plan, the key reason why the Galleries site is not a suitable alternative is due to its size. As shown on the diagrams prepared by Grimshaw below, the site is only able to accommodate the arena auditorium element of the proposal plus a small part of The Hub element. As a consequence, the Galleries site cannot accommodate a broadly similar development as that proposed on the Brabazon Hangar site. In addition, there are concerns over the scale and dominance of placing the arena auditorium and back of house use on this site in terms of its impact on the local townscape. Also, in order to accommodate a under-sized amount of servicing area, the back of house element cannot be placed along the full length of the 'stage' end of the auditorium.





#### IS THE SITE AN AVAILABLE ALTERNATIVE?

It is understood that the Galleries was recently sold by IntraRed Capital to LaSalle Investment Management for £32m. It is not yet known what the new owner intends to do with the shopping centre.

#### CONCLUSION

The Galleries shopping centre lies in a sequentially preferable location to the application site. However, it is not large enough to accommodate a broadly similar type of development as proposed at the Brabazon Hangar site.

# Appendix VII

## Bristol City FC

|                         |  |  |  |
|-------------------------|--|--|--|
| <b>SITE REFERENCE:</b>  | <b>67</b>  | <b>SITE NAME:</b> Bristol City Football Club |  |
| <b>SITE DESCRIPTION</b> |  |  |  |
| Location                | Ashton Road, Bedminster, Bristol.  |  |  |
| Site size               | Up to 2.7 hectares   |  |  |
| Current land uses       | Wickes DIY store and commercial premises.  |  |  |
| Adjoining land uses     | Ashton Gate stadium to the east, commercial and residential uses to the north, further commercial and trade counter uses to the west on the opposite side of Winterstoke Road and a retail park to the south.  |  |  |
| Planning history        | Several relatively minor planning applications associated with the existing retail and commercial uses on site.  |  |  |
| Planning policy status  | Northern part of the site allocated as a Principal Industrial and Warehousing Area in the Bristol development plan. Wickes DIY unit is not allocated.  |  |  |
| Constraints             | <p>Flood Risk</p> <ul style="list-style-type: none"> <li>- The majority of the site is located within Flood Zone 3, bar the southern stand and associated car parking which sits in Flood Zone 2.</li> </ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"> <li>- Situated directly to the north of the site is Greville Smyth Park which under the BCC SA&amp;DMP is designated as an important area of open space (Policy BSC9 &amp; DM17) and local historic park &amp; garden (Policy BCS22 &amp; DM31).</li> <li>- Abutting the south eastern corner of the site is Bristol Bowling Club situated off Duckmoor Road which under the BCC SA&amp;DMP is designated as an important area of open space (Policy BSC9 &amp; DM17).</li> </ul> |  |  |

|        |   |
|--------|---|
|        | <p>Note: Development proposals will need to safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance as denoted above.</p> <ul style="list-style-type: none"><li>- The adjacent Colliter's Brook represents a habitat which has been identified as particularly valuable in the Bristol Biodiversity Action Plan.</li></ul> |
| Ground | <ul style="list-style-type: none"><li>- The site has previously shown high levels of lead, arsenic and benzo(a)pyrene. This accompanied with a high groundwater table and the potential for ground gas was previously indicated. As part of the extensions to the stadium remediation in part was undertaken on site.</li></ul>   |

#### IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?

The nearest defined 'town centre' to this site is North Street, Bedminster. The walking distance between these two locations is circa 630 metres, making the site an out-of-centre location. Therefore, consideration must be given to whether the Bristol City FC site is more accessible and better connected to its nearest centre (North Street) or the city centre than the Brabazon Hangar site.

Based upon an analysis undertaken by Hydrock, the following accessibility characteristics are present:

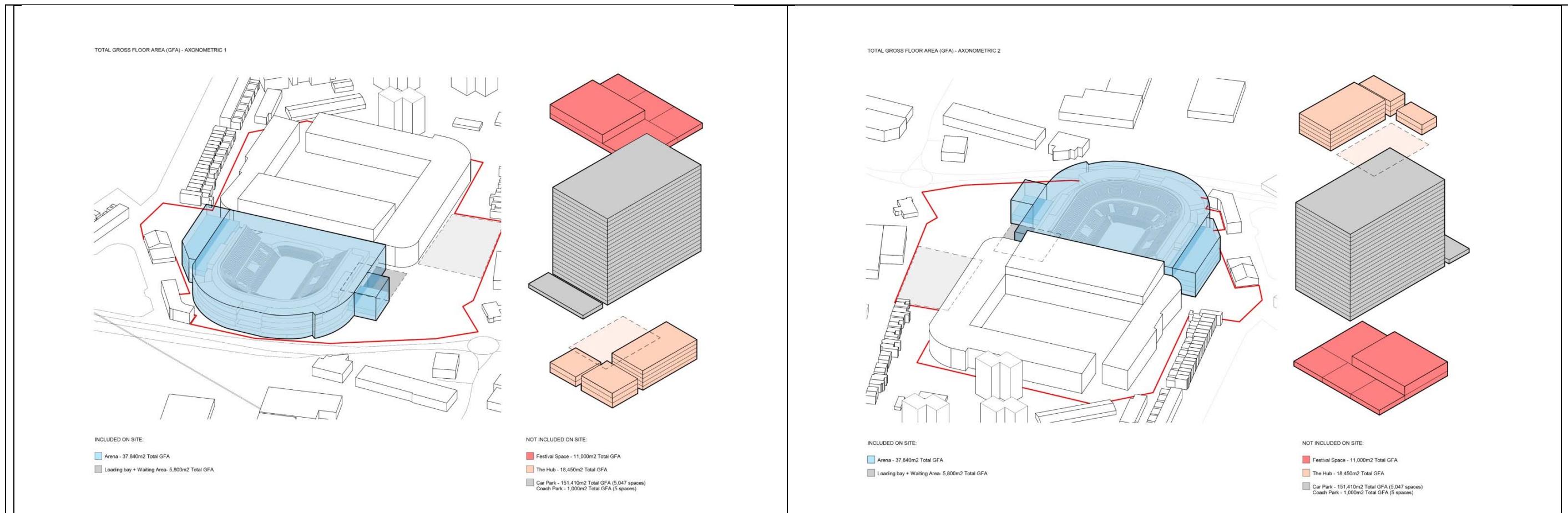
- In terms of accessibility and connectively by bus, the Ashton Gate site is located close to bus stops on Ashton Road and Winterstoke Road which are served by several different services which travel to the city centre and other parts of Bristol. MetroBus Route M2 also runs past the site and travels to the city centre and the UWE campus at Frenchay. As a consequence, we consider that the Ashton Gate site has similar characteristics to the Brabazon Hangar site in terms of bus accessibility.
- However, the Ashton Gate site has much poorer accessibility and connectivity in terms of rail travel. The Brabazon Hangar site will be located adjacent to a new rail station in Filton, whereas the Ashton Gate is a considerable walk from the nearest railway stations at Parson Street and Bedminster.

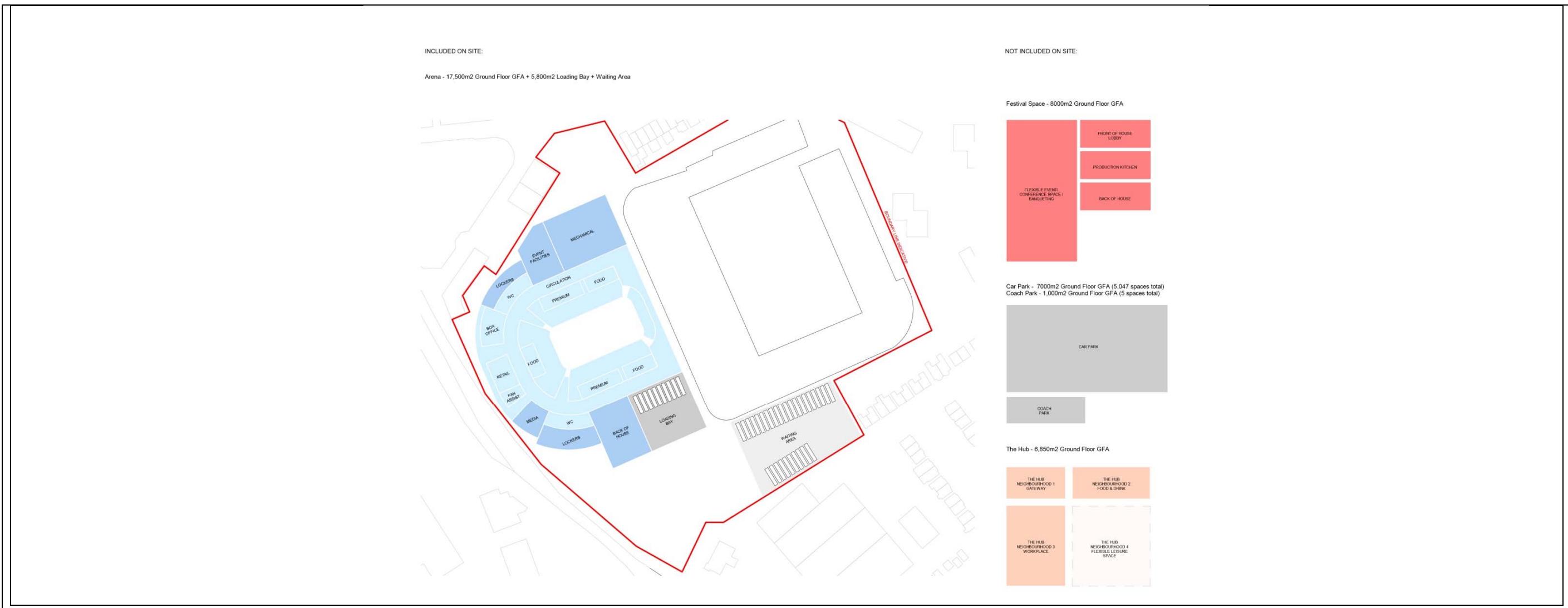
Therefore, the Ashton Gate site does not provide a sequentially preferable location to the Brabazon Hangar site. Therefore, there is no formal requirement to consider whether the Ashton Gate site can provide a suitable and available alternative.

#### IS THE SITE A SUITABLE ALTERNATIVE?

On a without prejudice basis, we have considered whether the Ashton Gate site can provide a suitable alternative for broadly the same type and scale of mixed use proposal as the Brabazon Hangar site. The focus of this assessment has been an analysis by Grimshaw to understand the scale of development which can be accommodated. The diagrams and plan below show the following:

- The only element of the proposal which can be accommodated in principle on the site is the arena auditorium, some back of house facilities and a loading area.
- A waiting area for coach parking could be accommodated on a different part of the Bristol City FC but this would necessitate removal of existing car parking and may well comprise the operation of the adjacent football stadium use.
- The Hub and Festive Space elements of the proposal cannot be accommodated, nor can multi-storey car parking provision, indicating that the site cannot accommodate a broadly similar type and scale of development to that proposed at the Brabazon Hangar site.
- The format of the arena auditorium shown on the diagrams below is unconventional, with back of house and supporting facilities unable to be accommodated behind the main stage area. In addition, the size of the arena auditorium building is such that it would lie very close to the main stand and hospitality areas in the football stadium and cause amenity and operational problems for the football stadium use.
- As a consequence of the above, it is clear that the Ashton Gate site is not a suitable alternative for the proposed development.





#### IS THE SITE AN AVAILABLE ALTERNATIVE?

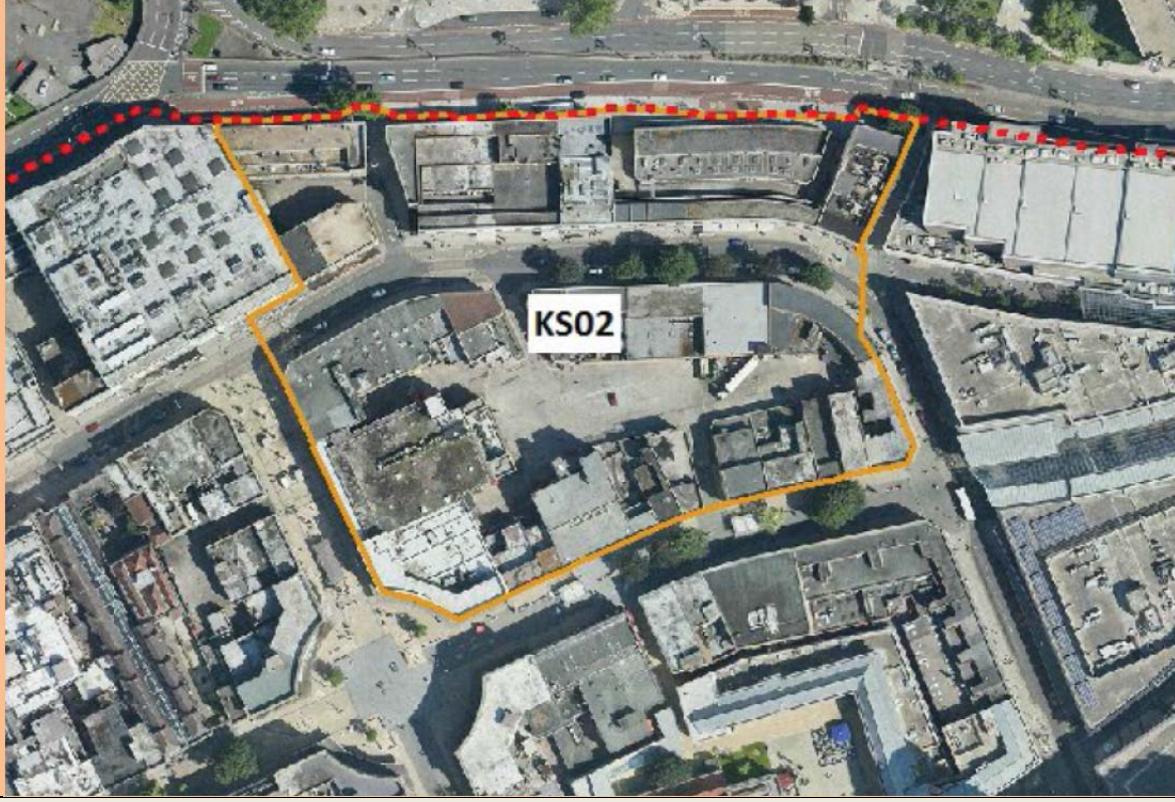
It is understood, from local press reports, that there are emerging plans for the redevelopment of this site for a 4,000 capacity sports and convention centre. Therefore, the site is not available for the type and scale of development proposed at the Brabazon Hangar site.

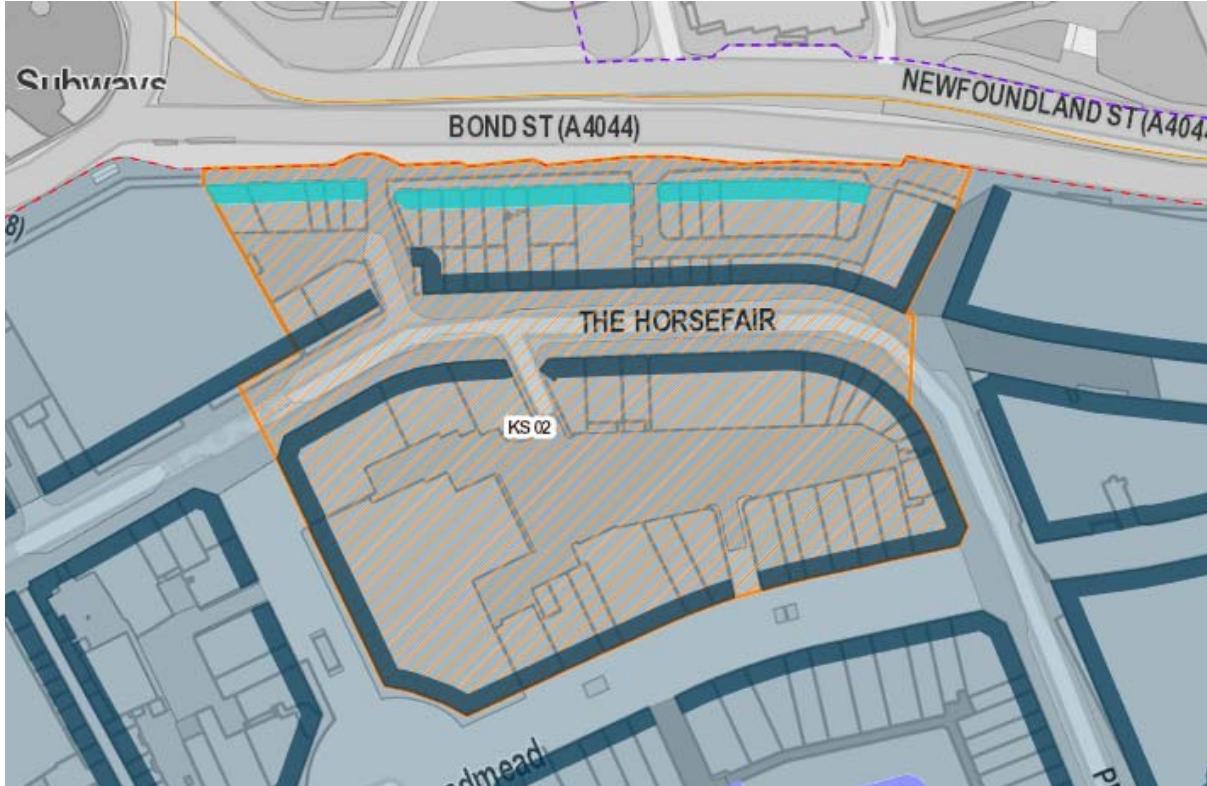
#### CONCLUSION

The Ashton Gate site lies in an out of centre location and is not more accessible and better connected to the city centre than the Brabazon Hangar site. In any event, it cannot form a suitable alternative for the proposal and is also not available for the type and scale of development being promoted by YTL at the Brabazon Hangar site.

# Appendix VIII

## Horsefair / Callowhill Court

|                         |  |  |   |
|-------------------------|--|--|---|
| <b>SITE REFERENCE:</b>  | 23   | <b>SITE NAME:</b> Horsefair / Callowhill Court |  |
| <b>SITE DESCRIPTION</b> |  |  |   |
| Location                | Situated directly adjacent to the A4044 – Bond Street – in the heart of the Bristol shopping quarter. The extent of the site is framed by Cabot Circus to the east, the central part of Broadmead to the west and south.   |  |   |
| Site size               | 2.3 ha site area for development plan allocation (KS02, shown above) and 3.48ha site area for outline planning permission (see below).   |  |   |
| Current land uses       | The site comprises of primarily retail uses, along with servicing areas.   |  |   |
| Adjoining land uses     | Cabot Circus shopping centre to the east, Broadmead to the west and south and office, hotel and residential uses to the north on the opposite side of Bond Street.   |  |   |
| Planning policy status  | <p>Allocated Site within the development plan. The site falls within the Bristol Local Plan - Bristol Central Area Plan (Policies Map Site KS02) and is allocated for major retail-led mixed use redevelopment and may include a proportion of leisure uses as appropriate to the Bristol shopping quarter primary shopping area.</p> <p>The relevant adopted local policies are set out in the Bristol Local Plan Core Strategy (2011); Development Management Policies (2014); and the Bristol Central Area Plan (2015).</p> <p><u><a href="#">Bristol Local Plan Core Strategy (2011)</a></u></p> <p>Policy BCS2 concerns Bristol City Centre, and expands the boundary of the designated centre. It promotes the strengthening of the city's role as a regional focus through the mixed use development including 'offices, residential, retail, leisure, tourism entertainment and arts and cultural facilities.' Other policies within the Core Strategy that are particularly relevant to any development proposal are as follows:</p> <p>BCS7: Centres and Retailing<br/> BCS8: Delivering a Thriving Economy<br/> BCS9: Green Infrastructure<br/> BCS10: Transport and Access Improvements<br/> BCS16: Flood Risk and Water Management<br/> BCS21: Quality Urban Design</p> |  |   |

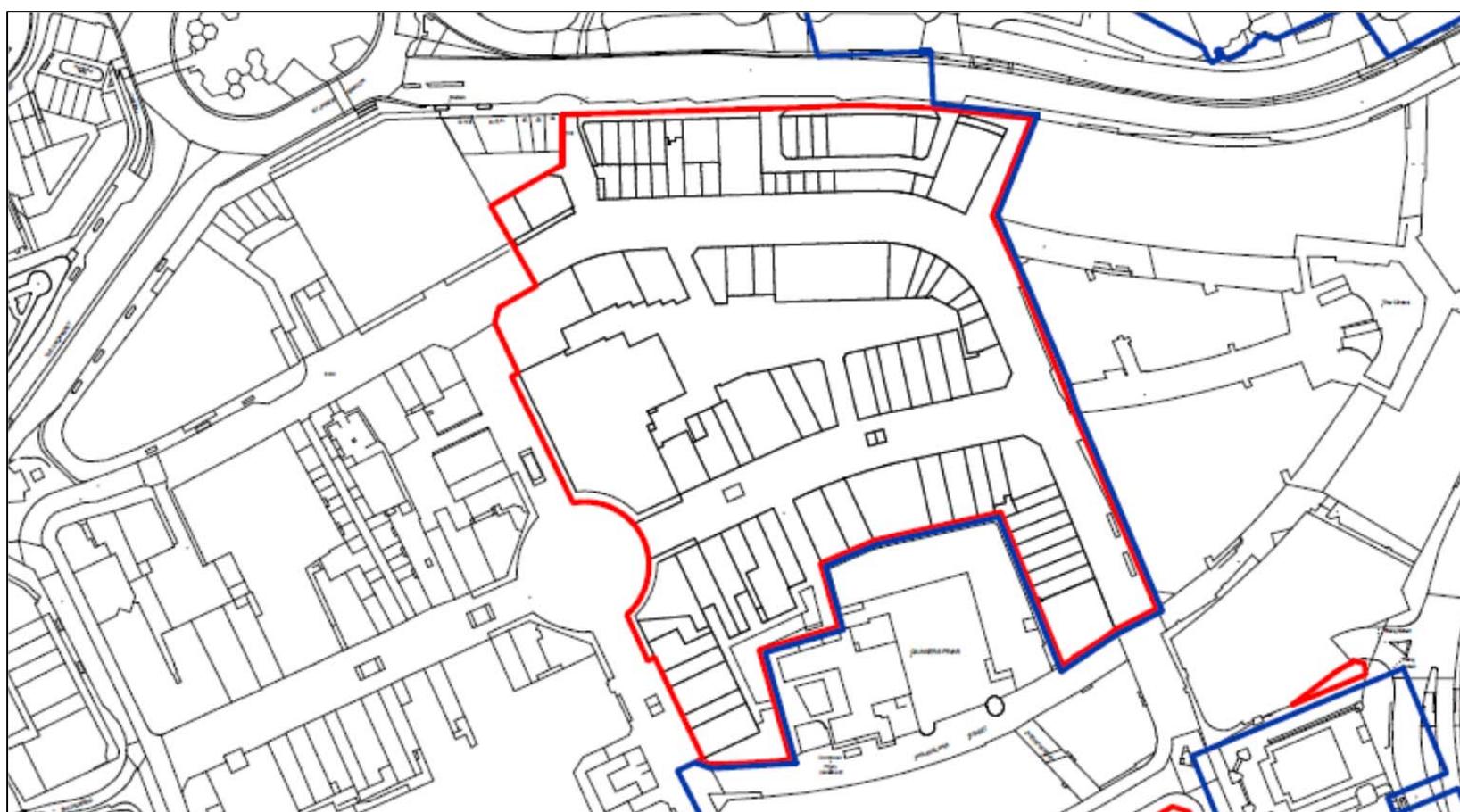
|             |  |
|-------------|--|
|             | <p><u>Bristol Local Plan Site Allocations and Development Management Policies (2014)</u></p> <p>Policies within the Development Management Policies that are particularly relevant to any development proposal are as follows:</p> <p>DM15: Green Infrastructure Provision<br/>DM17: Development involving existing Green Infrastructure<br/>DM23: Transport Development Management<br/>DM27: Layout and Form<br/>DM28: Public realm<br/>DM29: Design of New Buildings</p> <p><u>Bristol Local Plan – Bristol Central Area Action Plan (2015)</u></p>   |
| Constraints | <p>Flood Risk</p> <ul style="list-style-type: none"><li>- Based on the EA flood mapping tool the site is situated across Flood Zones 1 and Zone 2.</li></ul> <p>Air Quality</p> <ul style="list-style-type: none"><li>- The site has the potential to be affected by air quality. The site is located within the city's Air Quality Management Area (AQMA), which broadly covers the city centre and main arterial routes leading into the city. The AQMA has poor nitrogen dioxide levels.</li></ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- There are no listed buildings within this site. The closest ones lie to the west and south in other parts of the Broadmead shopping area and Quakers Friars.</li><li>- The site does not lie in a Conservation Area, although the Portland and Brunswick Square CA lies in close proximity to the north on the other side of Bond Street.</li></ul> |

#### IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?

Site lies within the defined city centre boundary and within the defined primary shopping area across Cabot Circus and Broadmead. It is therefore an in-centre site and in a sequentially preferable location to the Brabazon Hangar site.

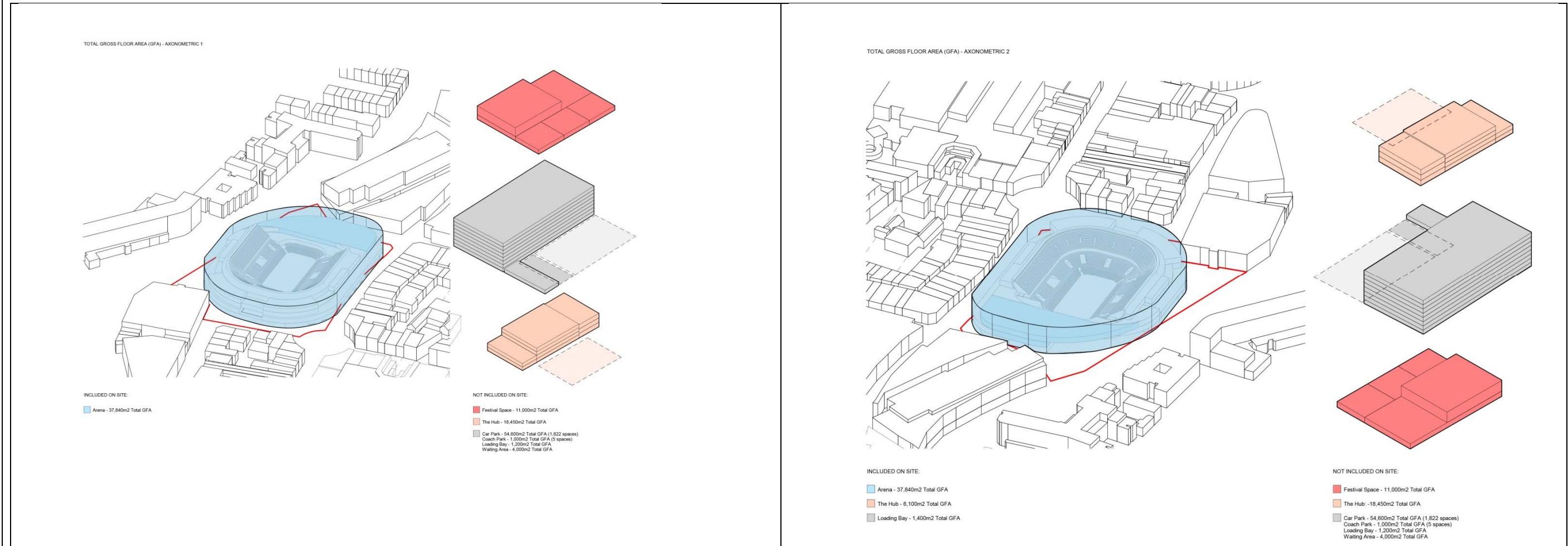
#### IS THE SITE A SUITABLE ALTERNATIVE?

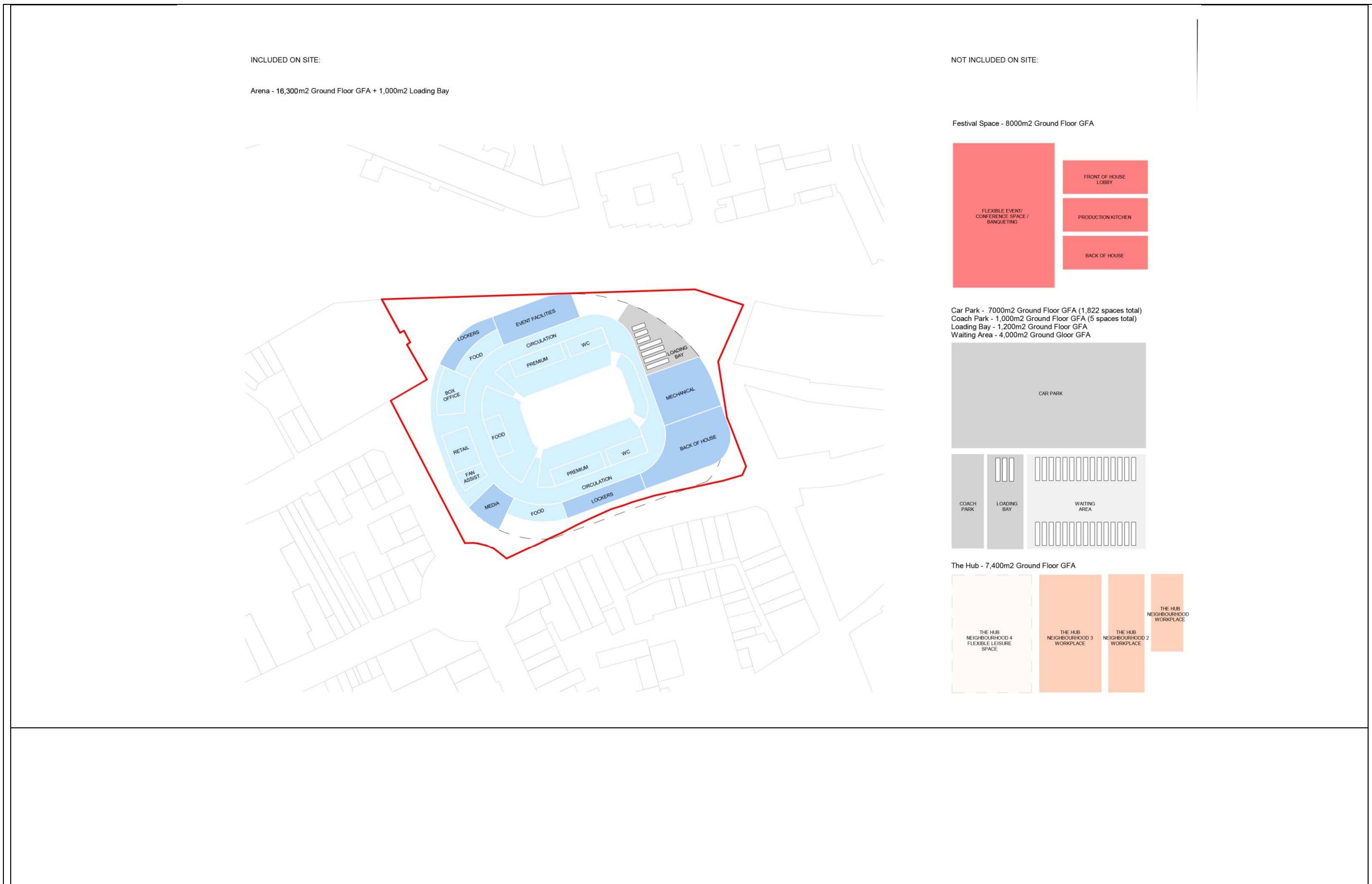
In addition to the allocation in the Bristol development plan, the Horsefair / Callowhill Court area has been subject to a recent outline planning application: 16/06594/P. Planning permission was granted in July 2018 for a mixed use redevelopment scheme for comprising up to 102,480 sq m of mixed use retail, commercial, leisure and hospitality floorspace (Use Class A1, A2, A3, A4, A5, C1, D2), as well as providing up to 150 Use Class C3 residential units, car parking, access, landscaping, public realm works and other associated ancillary works. It encompasses a wider area than the development plan allocation and is shown edged red in the plan below.



In principle, the planning permission and development plan allocation includes most but not all of the land uses in the proposed development. However, they do not include Class B1 and D1 uses. In addition, the supporting information submitted in support of the outline planning application indicates that the maximum amount of leisure floorspace will be 7,400sq m. Moreover, it is clear from the case made by BALP at the recent The Mall extension public inquiry that the dominant land use in the redevelopment scheme will be retail uses. Therefore, the Horsefair / Callowhill Court site is not considered to be an available alternative to the Brabazon Hangar site.

Grimshaw have tested the physical capacity of the site to accommodate the various elements of the proposal and this is shown in the diagrams below. The diagrams show that only the arena auditorium can be accommodated on the site with all other elements excluded. There is also no space to accommodate adequate servicing arrangements.





#### IS THE SITE AN AVAILABLE ALTERNATIVE?

It was concluded in the Secretary of State's decision on The Mall extension proposals at Cribbs Causeway that the Horsefair / Callowhill Court site was an available alternative for that particular development. Generally, the site is available although there is no suggestion that it is available specifically for the proposed development at the Brabazon Hangar site.

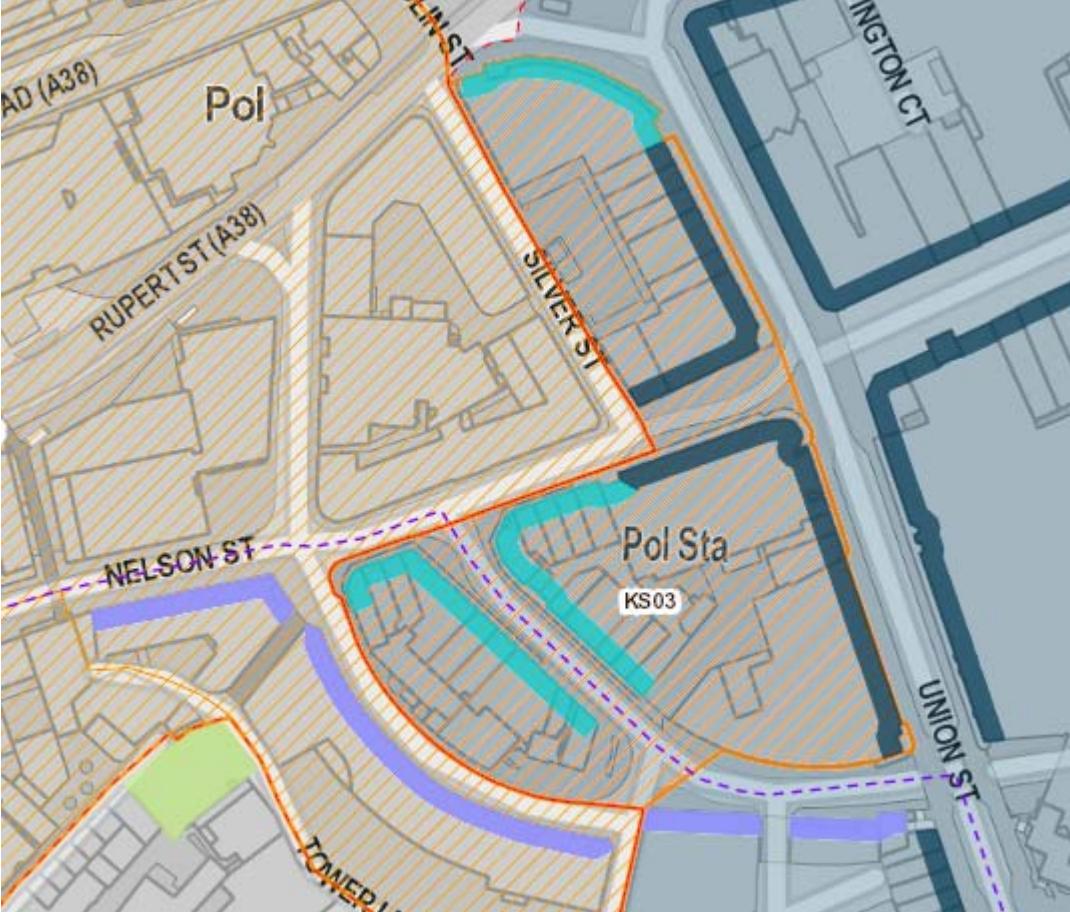
#### CONCLUSION

This site lies in a sequentially preferable location to the Brabazon Hangar site in an in-centre location. However, it is not large enough to accommodate the proposed development, even taking account of reasonable flexibility and an arena-led mixed use development on this site would not conform to the outline planning permission for this site. In addition, whilst a large part of the site is available for redevelopment, it is not available for an arena-led mixed use development.

# Appendix IX

## Union Street / Silver Street / All Saints Street

|                         |  |  |   |
|-------------------------|--|--|---|
| <b>SITE REFERENCE:</b>  | <b>24</b>  | <b>SITE NAME:</b> Union Street / Silver Street / All Saints Street |  |
| <b>SITE DESCRIPTION</b> |  |  |   |
| Location                | Located at the western end of the Broadmead shopping area, divided into three separate blocks between All Saints Street, Fairfax Street, Union Street, Nelston Street and Silver Street. |  |   |
| Site size               | 1.4 hectares   |  |   |
| Current land uses       | Mixture of land uses including retail, cinema, multi-storey car park and music entertainment venue.  |  |   |
| Adjoining land uses     | Broadmead shopping centre to the east, and a mix of retail, office, residential and hotel uses to the north, west and south.   |  |   |

|                        |  |
|------------------------|--|
| Planning policy status | <p>Allocated Site within the development plan: KS03. The site falls within the Bristol Local Plan - Bristol Central Area Plan (Policies Map Site KS02) and is allocated for retail and retail-led mixed uses. Extent of the KS03 development plan allocation is shown in the plan below.</p>  |
|------------------------|--|

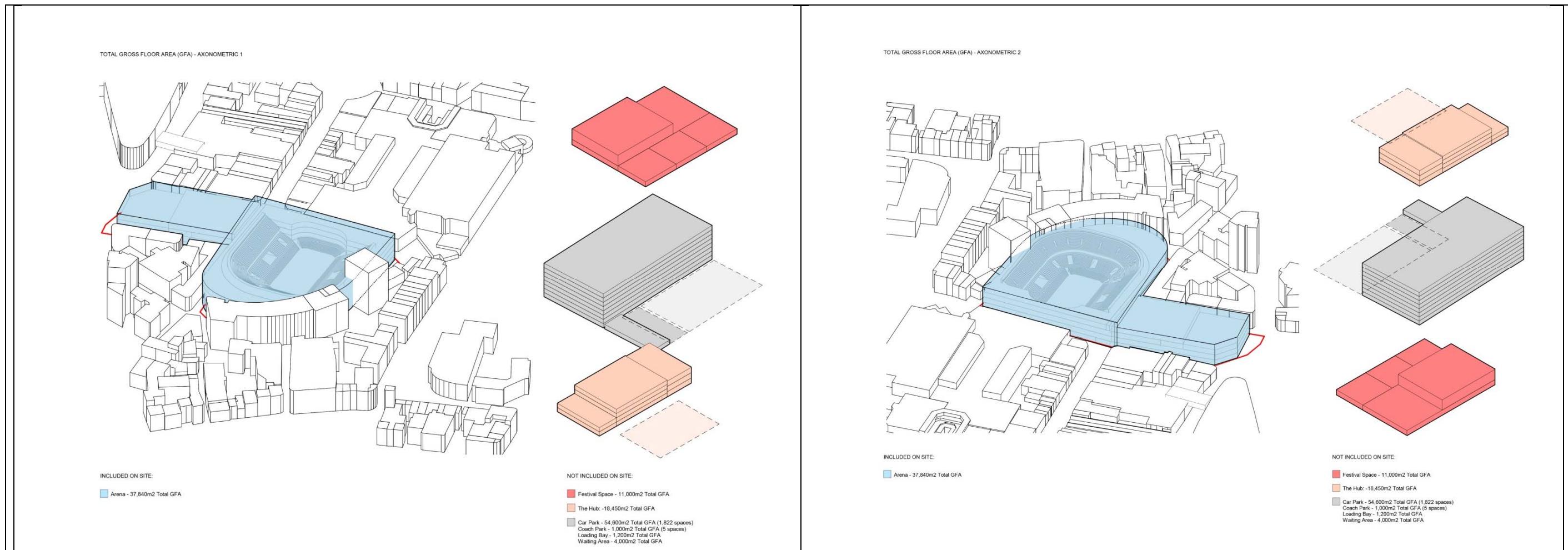
The relevant adopted local policies are set out in the Bristol Local Plan Core Strategy (2011); Development Management Policies (2014); and the Bristol Central Area Plan (2015).

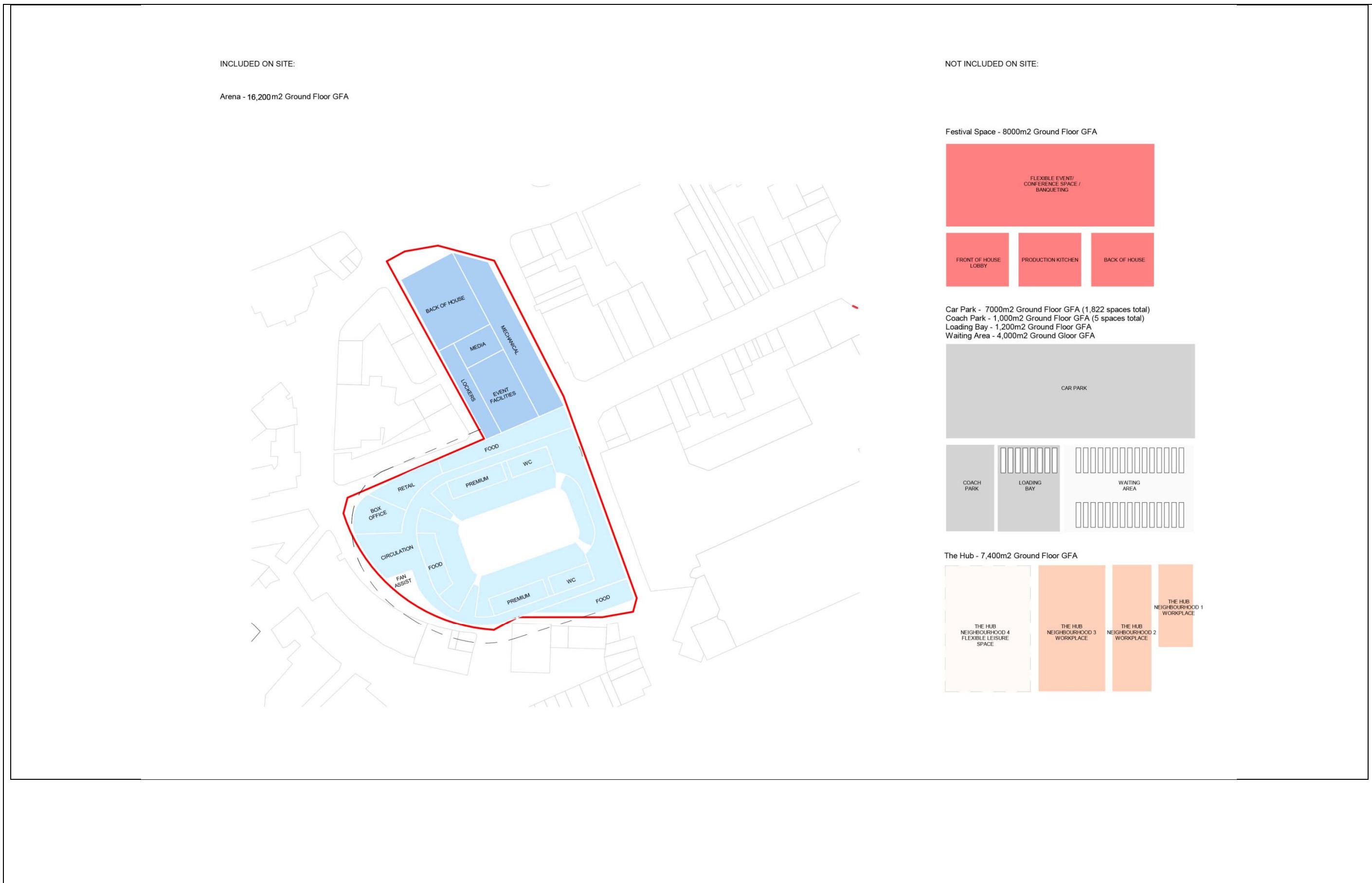
Bristol Local Plan Core Strategy (2011)

Policy BCS2 concerns Bristol City Centre, and expands the boundary of the designated centre. It promotes the strengthening of the city's role as a regional focus through the mixed use development including 'offices, residential, retail, leisure, tourism entertainment and arts and cultural facilities.' Other policies within the Core Strategy that are particularly relevant to any development proposal are as follows:

- BCS7: Centres and Retailing
- BCS8: Delivering a Thriving Economy
- BCS9: Green Infrastructure
- BCS10: Transport and Access Improvements
- BCS16: Flood Risk and Water Management
- BCS21: Quality Urban Design

|   |  |
|---|--|
|   | <p><u>Bristol Local Plan Site Allocations and Development Management Policies (2014)</u></p> <p>Policies within the Development Management Policies that are particularly relevant to any development proposal are as follows:</p> <p>DM15: Green Infrastructure Provision<br/>DM17: Development involving existing Green Infrastructure<br/>DM23: Transport Development Management<br/>DM27: Layout and Form<br/>DM28: Public realm<br/>DM29: Design of New Buildings</p> <p><u>Bristol Local Plan – Bristol Central Area Action Plan (2015)</u></p> <p>Allocated under KS03 for retail led mixed use development.</p>  |
| Constraints   | <p>Flood Risk</p> <ul style="list-style-type: none"><li>- Based on the EA flood mapping tool almost all of the site is situated Flood Zone 2.</li></ul> <p>Air Quality</p> <ul style="list-style-type: none"><li>- The site has the potential to be affected by air quality. The site is located within the city's Air Quality Management Area (AQMA), which broadly covers the city centre and main arterial routes leading into the city. The AQMA has poor nitrogen dioxide levels.</li></ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- There are no listed buildings within this site. The closest ones lie immediately to the west between Silver Street and Bridewell Street.</li><li>- The south-western part of the site lies in the City and Queen Square Conservation Area.</li></ul> |
| <b>IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?</b>  |  |
| Site lies within the defined city centre boundary and within the defined primary shopping area. It is therefore an in-centre site and in a sequentially preferable location to the Brabazon Hangar site.  |  |
| <b>IS THE SITE A SUITABLE ALTERNATIVE?</b>  |  |
| The site is allocated for retail led mixed use development in the development plan and therefore is an unsuitable alternative to the Brabazon Hangar site. In addition to being too small (see below) the site is split across three separate blocks with highways in between which will significantly reduce the viability of providing the proposal on this site. |  |
| Grimshaw have tested the physical capacity of the site to accommodate the various elements of the proposal and this is shown in the diagrams below. The diagrams show that only part of the arena auditorium can be accommodated, and in an unusual arrangement. All other elements cannot be accommodated and therefore this site is not a suitable alternative.   |  |





#### IS THE SITE AN AVAILABLE ALTERNATIVE?

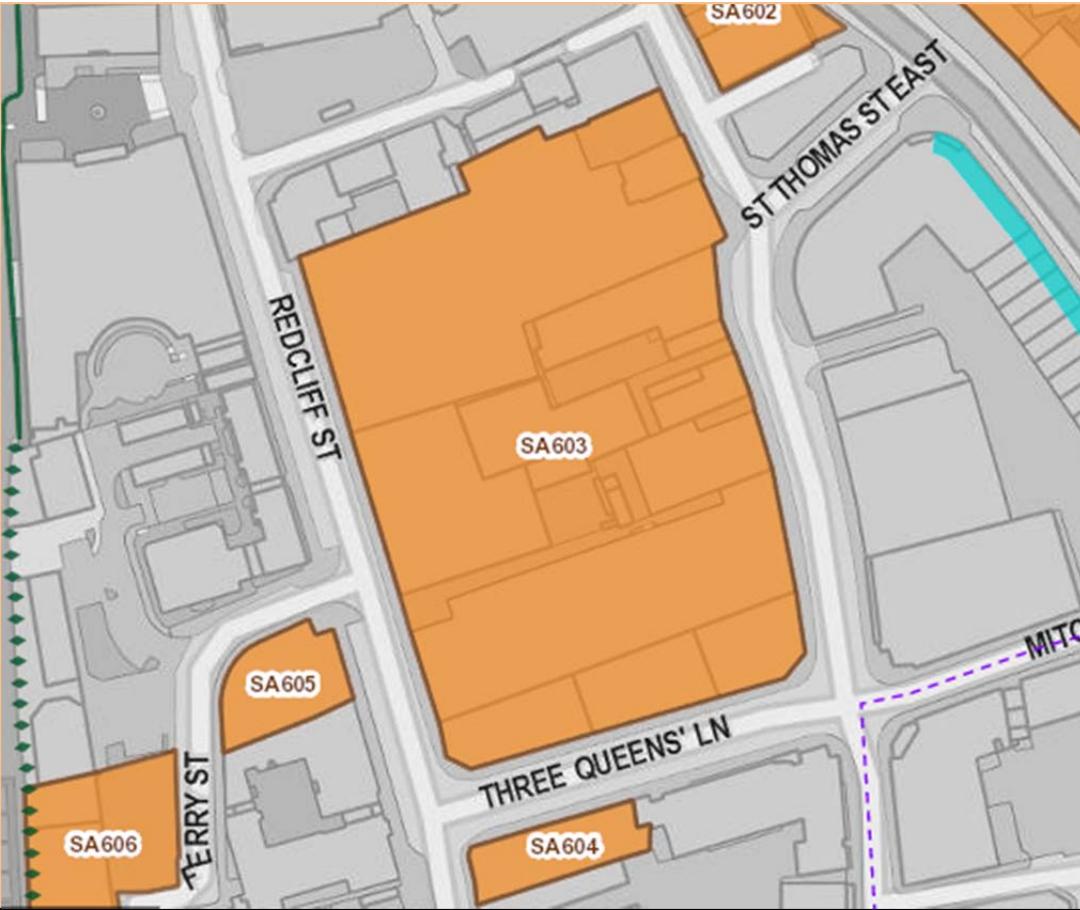
Whilst there are vacancies across parts of this area there is not any immediate availability for redevelopment. The northern part of the site along Union Street has been redeveloped and refurbished over the past several years in order to accommodate new tenants and therefore is unlikely to be available.

#### CONCLUSION

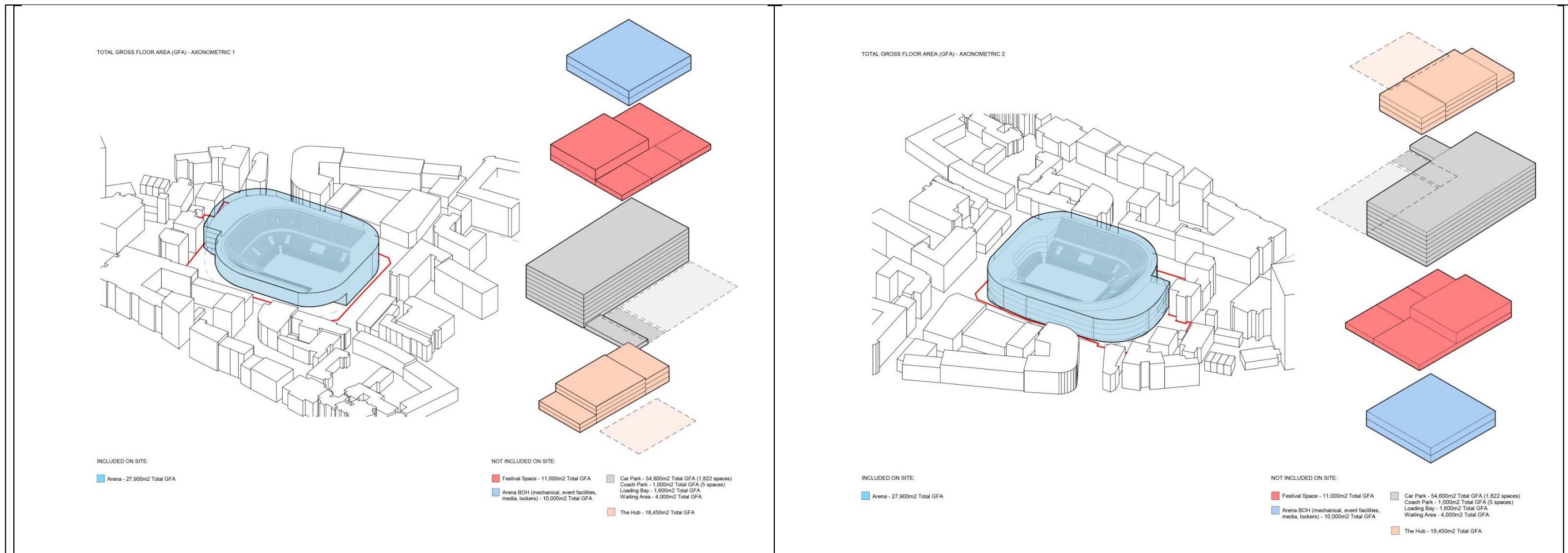
This site lies in a sequentially preferable location to the Brabazon Hangar site in an in-centre location. However, it is not large enough to accommodate the proposed development, even taking account of reasonable flexibility and an arena-led mixed use development on this site would not conform to the development plan for this site. In addition, the site does not appear to be available for comprehensive site-wide redevelopment in one phase.

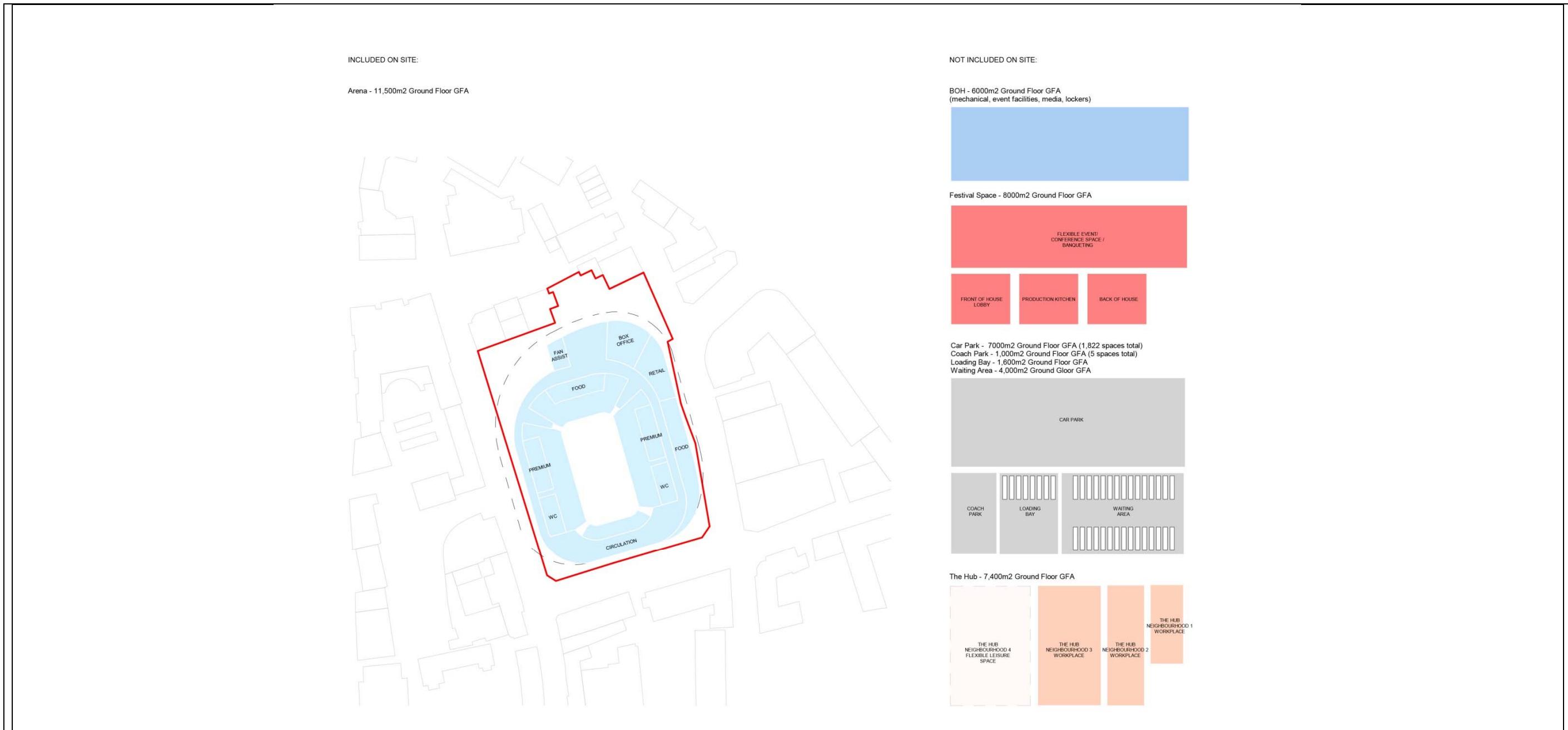
# Appendix X

## Redcliffe Village

|                         |  |                                     |  |
|-------------------------|--|-------------------------------------|--|
| <b>SITE REFERENCE:</b>  | 42   | <b>SITE NAME:</b> Redcliffe Village |  |
| <b>SITE DESCRIPTION</b> |  |                                     |  |
| Location                | A large rectangular area of land to the south, east and west of the floating harbour which has been mostly cleared of a collection of former commercial buildings and is in the process of being redeveloped. The site is bounded by Redcliff Street, Three Queens Lane  |                                     |  |
| Site size               | 1.4 hectares   |                                     |  |
| Current land uses       | Mixture of land uses including retail, cinema, multi-storey car park and music entertainment venue.  |                                     |  |
| Adjoining land uses     | Site is surrounded by a mixture of office, residential and commercial uses.  |                                     |  |
| Planning policy status  | <p>Allocated Site within the development plan: SA603. The site falls within the Bristol Local Plan - Bristol Central Area Plan and is allocated for housing, office and leisure uses. Extent of the SA603 development plan allocation is shown above.</p> <p>The relevant adopted local policies are set out in the Bristol Local Plan Core Strategy (2011); Development Management Policies (2014); and the Bristol Central Area Plan (2015).</p> <p><u><a href="#">Bristol Local Plan Core Strategy (2011)</a></u></p> <p>Policy BCS2 concerns Bristol City Centre, and expands the boundary of the designated centre. It promotes the strengthening of the city's role as a regional focus through the mixed use development including 'offices, residential, retail, leisure, tourism, entertainment and arts and cultural facilities.' Other policies within the Core Strategy that are particularly relevant to any development proposal are as follows:</p> <p>BCS7: Centres and Retailing<br/> BCS8: Delivering a Thriving Economy<br/> BCS9: Green Infrastructure</p> |                                     |  |

|  |   |
|--|---|
|  | <p>BCS10: Transport and Access Improvements<br/>BCS16: Flood Risk and Water Management<br/>BCS21: Quality Urban Design</p> <p><u><a href="#">Bristol Local Plan Site Allocations and Development Management Policies (2014)</a></u></p> <p>Policies within the Development Management Policies that are particularly relevant to any development proposal are as follows:</p> <p>DM15: Green Infrastructure Provision<br/>DM17: Development involving existing Green Infrastructure<br/>DM23: Transport Development Management<br/>DM27: Layout and Form<br/>DM28: Public realm<br/>DM29: Design of New Buildings</p> <p><u><a href="#">Bristol Local Plan – Bristol Central Area Action Plan (2015)</a></u></p> <p>Allocated under SA603 for residential, office and leisure uses.</p>                               |
| Constraints  | <p>Flood Risk</p> <ul style="list-style-type: none"><li>- Based on the EA flood mapping tool this site is in a mixture of flood zones 2 and 3.</li></ul> <p>Air Quality</p> <ul style="list-style-type: none"><li>- The site has the potential to be affected by air quality. The site is located within the city's Air Quality Management Area (AQMA), which broadly covers the city centre and main arterial routes leading into the city. The AQMA has poor nitrogen dioxide levels.</li></ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- There are no listed buildings within this site, although there are two listed buildings on the northern edge of the site: the Severn Stars public house and the Wool Hall.</li><li>- The site lies within a Conservation Area.</li></ul> |
| <b>IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?</b>   |   |
| Site lies within the defined city centre boundary but some distance away from the defined primary shopping area. It is however close to the defined secondary shopping frontages and therefore can be regarded as a sequentially preferable location to the Brabazon Hangar site.  |   |
| <b>IS THE SITE A SUITABLE ALTERNATIVE?</b>   |   |
| The site is allocated for residential, office and leisure land uses which conform with part but not all of the land uses in the Brabazon Hangar arena mixed use development proposal.  |   |
| In addition to its development plan allocation, the Redcliffe Village site has planning permission for a mixed use redevelopment scheme for 274 residential units, a 236 bed hotel, 2,199sq m of Class A1-5 retail space and 1,547sq m of Class B1 office space. This permission is in the process of being implemented. As a consequence, this site is not a suitable alternative to the Brabazon Hangar site.  |   |
| In addition this site is considered to be too small to accommodate the proposal taking into account reasonable flexibility. To demonstrate this Grimshaw have tested the physical capacity of the site to accommodate the various elements of the proposal and this is shown in the diagrams below. These diagrams show that only the arena auditorium can be accommodated (with very little room to spare) and no ability to accommodate any other elements of the scheme (including servicing areas). Therefore, the Redcliff Village site is clearly not a suitable alternative to the Brabazon Hangars site. |   |





#### IS THE SITE AN AVAILABLE ALTERNATIVE?

This site is considered to be available in general terms although an extant planning permission is in the process of being implemented and therefore the Redcliffe Village site is not available for the proposal.

#### CONCLUSION

This site lies in a sequentially preferable location to the Brabazon Hangar site in an in-centre location in relation to leisure uses and a potential edge of centre site in terms of retail uses. However, it is not large enough to accommodate the proposed development, even taking account of reasonable flexibility and an arena-led mixed use development on this site would not conform to the development plan allocation and planning permission for this site.

# Appendix XI

## Avonmeads Retail Park

|                         |  |   |  |
|-------------------------|--|---|--|
| <b>SITE REFERENCE:</b>  | <b>66</b>  | <b>SITE NAME:</b> Avonmeads Retail Park |  |
| <b>SITE DESCRIPTION</b> |  |   |  |
| Location                | Retail and leisure park location to the east of Bristol city centre in the St Philips area of the city.  |   |  |
| Site size               | Circa 7 hectares   |   |  |
| Current land uses       | Mixture of land uses including retail, cinema, restaurants and a ten pin bowling alley.  |   |  |
| Adjoining land uses     | Site lies adjacent to the River Avon along with a collection of commercial uses including car showrooms and trade-related uses.  |   |  |
| Planning policy status  | Site is not allocated in the Bristol development plan and lies outside of any defined 'town centre'. Nearest 'town centre' in the hierarchy is Sandy Park Road local centre to the south.  |   |  |
| Constraints             | <p>Flood Risk</p> <ul style="list-style-type: none"><li>- Based on the EA flood mapping tool this site mainly within Flood Zone 1 although the eastern edge, where it joins the River Avon, is in Flood Zone 3.</li></ul> <p>Air Quality</p> <ul style="list-style-type: none"><li>- The site has the potential to be affected by air quality. The site is located within the city's Air Quality Management Area (AQMA), which broadly covers the city centre and main arterial routes leading into the city. The AQMA has poor nitrogen dioxide levels.</li></ul> <p>Conservation &amp; Heritage</p> <ul style="list-style-type: none"><li>- There are no listed buildings within this site, although the Grade I listed Avon Bridge lies immediately to the east of the site.</li><li>- The nearest Conservation Area lies a reasonable distance to the south of the site at Arnos Vale.</li></ul> |   |  |

#### IS THIS SITE IN A SEQUENTIALLY PREFERABLE LOCATION TO THE APPLICATION SITE?

Site lies outside of any defined 'town centre' in the Bristol centre hierarchy. The nearest centre is Sandy Park Road which is some 1.4 km to the south. The city centre is 2.6km to the west of the site.

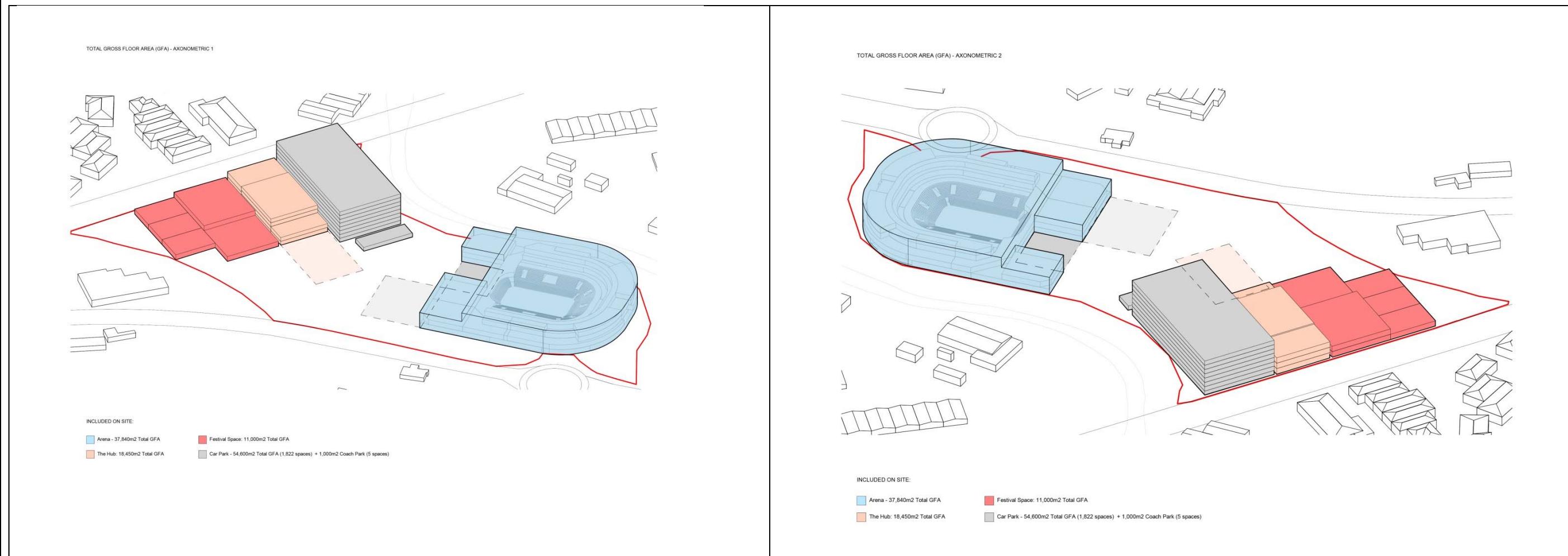
As a consequence, the Retail Park lies in an out of centre location and consideration will need to be given to whether it is more accessible and better connected to the city centre or any other centre than the Brabazon Hangar site.

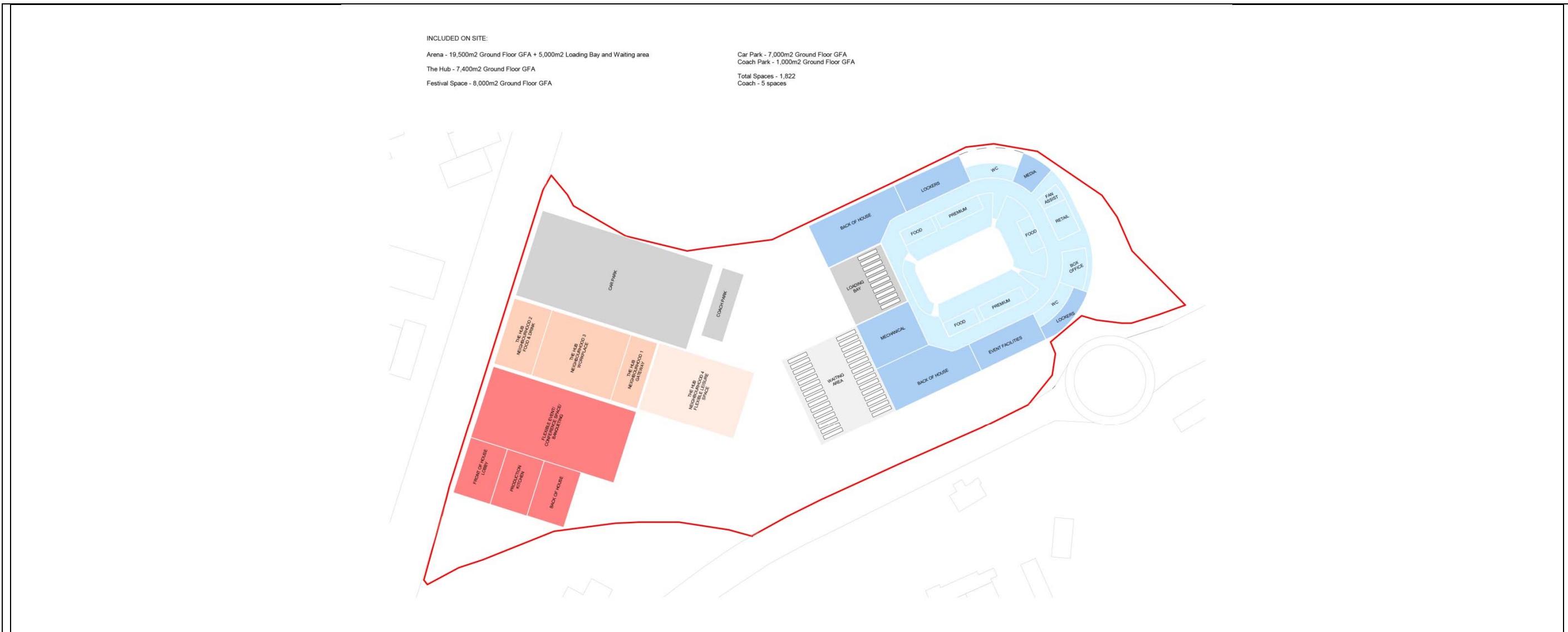
There are no bus stops in reasonable walking distance of the retail park and there are no bus routes which pass the site. In addition, whilst there are railway lines which pass both sides of the site there are no railway stations in reasonable walking distance (and no planned new stations). As a consequence, the Brabazon Hangar site is more accessible and better connected to 'town centres' than the Avonmeads Retail Park site.

#### IS THE SITE A SUITABLE ALTERNATIVE?

Notwithstanding the fact that the Retail Park does not lie in a sequentially preferable location to the Brabazon Hangar site we have assessed its suitability to accommodate the proposal.

Grimshaw have tested the physical capacity of the site to accommodate the various elements of the proposal and this is shown in the diagrams below. It shows that if the whole of the site was available for complete redevelopment then it may be possible, in principle, to accommodate the various elements of the proposal. However, as will be shown below, all of the site is not available for redevelopment and also that the diagrams below show that an alternative access arrangement would be required. This is very unlikely to succeed given that there is no other viable vehicle access into the site (including a river on one boundary, a railway on another and a raised dual carriageway on another).





## IS THE SITE AN AVAILABLE ALTERNATIVE?

The available evidence suggests that the cinema and ten pin bowling alley elements of site may be available in the future. This is based upon the promotion of the cinema site in 2015 as part of the Bristol development plan and applications to change the use of the bowling alley. However, the remainder of the retail park is not available and the leases on the various units mean that these are not available.

## CONCLUSION

This site does not lie in a sequentially preferable location to the Brabazon Hangar site and the parts of the site which may be available in the future are not large enough to accommodate the proposal even taking into account reasonable flexibility.

# Appendix XII

## Long List of Alternatives

# Long List of Alternative Sites & Premises

---

## Introduction

This document has been prepared by Avison Young for YTL to establish the 'long list' of alternative sites which may be examined as part of the 'sequential test' for the 'Arena and associated development' proposal at the Brabazon hangar site at Filton Airfield. The 'Arena and associated development' proposal involves main town centre uses (as defined by the 2019 version of the National Planning Policy Framework ('NPPF')) and therefore under local development plan and national planning policy a planning application for these uses will be required to be supported by an assessment to demonstrate that the proposal complies with the sequential test.

The purpose of this document is to identify a 'long list' of alternative sites and premises for the sequential test. This is clearly a starting point for the assessment of alternatives and the list of alternatives below will be reduced once specific characteristics associated with the 'Arena and associated development' proposal are taken into account.

For the purposes of this long list, two specific aspects are important:

- a) The area of search for alternatives; and
- b) The sites and premises which should be included in the initial 'long list'.

In terms of the area of search for alternatives, the general approach for the sequential test is to consider the primary catchment of the proposal. In this instance, the primary catchment will be focused upon the West of England area although the special circumstances surrounding an 'Arena and associated development' use are that it can only realistically be placed in a large settlement/area which has a large concentration of resident population and infrastructure which is able to accommodate large number of people attending events at the Arena. As a consequence, the only realistic area to locate the Arena and associated development will be in the wider Bristol urban area (covered by the administrative areas of Bristol City Council ('BCC') and the North and East Fringes of Bristol within South Gloucestershire Council's ('SGC') administrative area. However, we have also included key development sites in Weston-super-Mare and the central area of Bath on a without prejudice basis (the reasons why Weston is not a suitable alternative location for the proposal are outlined in the accompanying report). For sites in Weston, this has included consultation with officers at North Somerset Council.

In order to ensure a robust assessment of alternative sites and premises, the approach to the sequential test has been to identify a 'long list' of sites across the wider Bristol urban area from various sources including development plan documents and sites assessed as part of the previous Arena proposals in Bristol city centre. In addition, other large sites, without any development plan allocation, have also been identified. The final version of the 'long list' will be agreed between AY, YTL, BCC and SGC and this version of the document (v4.1) is the starting point for reaching this agreement. The identification of alternatives for the 'long list' has been guided by the following:

- We have re-assessed the sites considered as potential alternatives in the Environmental Statement accompanying the Arena proposal in Bristol city centre.
- We have also assessed all sites within the Bristol Temple Quarter Enterprise Zone Prospectus and the 2017 Bristol Investment Prospectus.
- Apart from very small sites, we have assessed the major allocated sites in the Bristol Central Area Plan.
- Apart from large sites close to Bristol city centre and South Bristol (i.e. Hengrove) we have not assessed allocated sites in the Bristol Site Allocations and Development Management Policies Plan as they are generally small scale and/or in residential areas which are clearly not well suited to large scale main town centre uses attracting a lot of visitors.
- We have assessed large scale sites in South Gloucestershire's North and East Fringe which are allocated in the Core Strategy or Site Allocations Plan, plus the area covered by the Cribbs Patchway New Neighbourhood Supplementary Planning Document.
- Whilst Bath city centre is not the main focus for the search for alternatives, we have assessed major allocated sites in or adjacent to the city centre in the adopted B&NES Placemaking Plan.
- We have also assessed areas proposed to be allocated for development in the West of England Joint Spatial Plan.
- Finally, we have also included key development sites in Weston-super-Mare, including sites from the town centre SPD and 2018 Site Allocations Plan.

Further more detailed explanation of the focus for the area of search and the approach of moving from the long list to the short list of sites for assessment can be found in the main sequential test document to be prepared by AY. For the purposes of discussion with BCC and SGC, we have marked up each site in the 'long list' according to its potential to be either dismissed at this stage or to be taken forward to the 'short list' of sites for further detailed assessment:

- GREEN: site can be dismissed from the 'long list' as not being suitable
- AMBER: site unlikely to be suitable and available although may be taken forward for further consideration in the 'short list' following discussion between AY, YTL, SGC and BCC
- RED: site will definitely be taken forward for further consideration in the 'short list'

| No. | Site Name                           | Description | Site Identified Via  | Site Plan | Site Size | Include on Short List ? / Initial assessment of Suitability and Availability  |
|-----|-------------------------------------|-------------|--|-----------|-----------|---|
| 1   | Former diesel depot site            |             | Site of planning application for previous Arena proposal in Bristol. |           |           | Include on short list, on the basis that, whilst Arena proposal abandoned, it would be useful to assess this site to demonstrate why it was abandoned.                |
| 2   | Former Royal Mail sorting depot     |             | Temple Meads planning application Environmental Statement            |           |           | Include on short list on the basis that whilst it was discounted last time and may be too small, assessment in Arena ES was weak and therefore needs to be bolstered. |
| 3   | Silverthorne Lane                   |             | Temple Meads planning application Environmental Statement            |           |           | Include on short list on the basis that whilst it was discounted last time and may be too small, assessment in Arena ES was weak and therefore needs to be bolstered. |
| 4   | Plot 3, Temple Quay                 |             | Bristol TQEZ Development Prospectus (March 2014)                     |           |           | Dismiss as site is too small.   |
| 5   | Bank Place, Temple Way              |             | Bristol TQEZ Development Prospectus (March 2014)                     |           |           | Dismiss as site is too small.   |
| 6   | Glassfields, Temple Way             |             | Bristol TQEZ Development Prospectus (March 2014)                     |           |           | Dismiss as site is too small.   |
| 7   | Old Bread Street, Temple Quay North |             | Bristol TQEZ Development Prospectus (March 2014)                     |           |           | Dismiss as site is too small.   |
| 8   | Plot ND7, Temple Quay North         |             | Bristol TQEZ Development Prospectus (March 2014)                     |           |           | Dismiss as site is too small.   |
| 9   | Anvil Street, Temple Quay North     |             | Bristol TQEZ Development Prospectus (March 2014)                     |           |           | Dismiss as site is too small.   |
| 10  | 2 Glass Wharf, Temple Quay North    |             | Bristol TQEZ Development Prospectus (March 2014)                     |           |           | Dismiss as site is too small.   |
| 11  | 3 Glass Wharf, Temple Quay North    |             | Bristol TQEZ Development Prospectus (March 2014)                     |           |           | Dismiss as site is too small.   |

| No. | Site Name   | Description | Site Identified Via                              | Site Plan | Site Size | Include on Short List ? / Initial assessment of Suitability and Availability  |
|-----|---|-------------|--|-----------|-----------|---|
| 12  | Plot 6, Temple Quay                               |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 13  | Temple Circus, Temple Street                      |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 14  | Temple Circus 'Island' site                       |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 15  | Former garage site, Temple Gate                   |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.]  |
| 16  | Templegate Peugeot garage, Temple Gate            |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 17  | Bristol & Exeter, Temple Gate                     |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 18  | Engine Shed                                       |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 19  | Temple Meads railway station                      |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 20  | Temple Gate multi-storey car park                 |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 21  | Former Pest Control depot site                    |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 22  | Fish Dock / Kwik Fit site                         |             | Bristol TQEZ Development Prospectus (March 2014) |           |           | Dismiss as site is too small.   |
| 23  | Horsefair / Callowhill Court, Bristol city centre | KS02        | Bristol Central Area Plan 2015                   |           |           | Site to be included on the basis of current redevelopment proposals and reference to this area in The Mall extension Secretary of State decision. |

| No. | Site Name  | Description | Site Identified Via            | Site Plan | Site Size | Include on Short List ? / Initial assessment of Suitability and Availability  |
|-----|--|-------------|--------------------------------|-----------|-----------|---|
| 24  | Union Street / Silver Street / All Saints Street | KS03        | Bristol Central Area Plan 2015 |           |           | Inclusion due to site size but unlikely to be suitable.   |
| 25  | St Mary le Port                                  | KS04        | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |
| 26  | Central ambulance station                        | KS05        | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |
| 27  | Nelson Street / Lewins Mead                      | KS08        | Bristol Central Area Plan 2015 |           |           | Include, due to size of total site allocation.  |
| 28  | Newfoundland Way                                 | KS09        | Bristol Central Area Plan 2015 |           |           | Inclusion due to site size  |
| 29  | Redcliffe Way                                    | KS10        | Bristol Central Area Plan 2015 |           |           | Potential inclusion due to site size although likely to be found unsuitable due to availability and heritage / built environment constraints. |
| 30  | Wapping Wharf                                    | SA101       | Bristol Central Area Plan 2015 |           |           | Potential inclusion due to site size.   |
| 31  | Waterfront site, Millenium Square                | SA102       | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |
| 32  | West Purifier House                              | SA103       | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |
| 33  | McArthur's Warehouse                             | SA104       | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |
| 34  | South of Brunel Lock Road                        | SA105       | Bristol Central Area Plan 2015 |           |           | Potential inclusion due to site size.   |
| 35  | Disused transit sheds                            | SA401       | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small  |
| 36  | Broad Quay House                                 | SA402       | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |
| 37  | Land at Surrey Street                            | SA503       | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |
| 38  | The Carriageworks & Westmoreland House           | SA505       | Bristol Central Area Plan 2015 |           |           | Potential inclusion due to long term vacancy and redevelopment potential of this site.  |
| 39  | Wilder Street                                    | SA509       | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |
| 40  | Dove Lane  | SA510       | Bristol Central Area Plan 2015 |           |           | Potential inclusion due to site size  |
| 41  | Former Courage Brewery                           | SA601       | Bristol Central Area Plan 2015 |           |           | Exclude as site is now substantially redeveloped.   |
| 42  | Redcliffe Village                                | SA603       | Bristol Central Area Plan 2015 |           |           | Include due to high profile nature of redevelopment site, but likely to be dismissed on the basis of site and alternative uses.               |
| 43  | Fire Station site                                | SA607       | Bristol Central Area Plan 2015 |           |           | Include due to high profile nature of redevelopment site, but likely to be dismissed on the basis of site and alternative uses.               |
| 44  | Victoria Street / Temple Street                  | SA608       | Bristol Central Area Plan 2015 |           |           | Dismiss as site is too small.   |

| No. | Site Name   | Description | Site Identified Via                     | Site Plan | Site Size | Include on Short List ? / Initial assessment of Suitability and Availability   |
|-----|---|-------------|---|-----------|-----------|--|
| 45  | Temple Street / Victoria Street                         | SA609       | Bristol Central Area Plan 2015          |           |           | Dismiss as site is too small.  |
| 46  | Fruit Wholesale Market, Albert Road                     |             | Unallocated site                        |           |           | Include due to size of site  |
| 47  | Paintworks Phase 3, Arno's Vale                         | BSA1202     | Site Allocations Plan                   |           |           | Potentially include due to size of site  |
| 48  | Government offices, Flowers Hill, Brislington           | BSA1203     | Site Allocations Plan                   |           |           | Potentially include due to size of site.   |
| 49  | Former City of Bristol College site, Hawkfield Road     | BSA1301     | Site Allocations Plan                   |           |           | Include due to size of site and focus on regeneration of South Bristol   |
| 50  | Imperial Park   | BSA1302     | Site Allocations Plan                   |           |           | Include due to size of site and focus on regeneration of South Bristol   |
| 51  | Hengrove Park   | BSA1401     | Site Allocations Plan                   |           |           | Include due to size of site and focus on regeneration of South Bristol   |
| 52  | Site of Planning Permission for Bristol City FC Stadium |             | Unallocated site                        |           |           | Include due to size of site and focus on regeneration of South Bristol   |
| 53  | UWE Stadium site, Stoke Gifford                         | PSP47(15)   | South Glos PSP Plan                     |           |           | Include due to size of site and nature of permitted proposals.   |
| 54  | East of Harry Stoke                                     | CS27        | South Glos Core Strategy                |           |           | To be dismissed on the basis of development plan strategy for housing and not sequentially preferable.   |
| 55  | Land East of Coldharbour Lane                           | CS28        | South Glos Core Strategy                |           |           | To be dismissed on the basis of development plan strategy for housing and not sequentially preferable.   |
| 56  | CPNN area   |             | Adopted Supplementary Planning Document |           |           | Potentially include to demonstrate that there are not any sequentially preferable locations in the CPNN area.  |
| 57  | Emersons Green  | CS29        | South Glos Core Strategy                |           |           | To be dismissed on the basis of development plan strategy for housing and not sequentially preferable.   |
| 58  | Bath Western Riverside, Bath                            |             | B&NES Placemaking Plan                  |           |           | To be dismissed on the basis of development plan strategy for housing.   |
| 59  | Sydenham Park, Bath                                     | SB7         | B&NES Placemaking Plan                  |           | 2.6ha     | <p>Sydenham Park is one element of the Green Park Station West &amp; Sydenham Park allocation in the adopted Placemaking Plan. The site currently contains a Homebase DIY retail store and surface level car parking. The site is in the ownership of British Land and Sainsburys. Sydenham Park lies in</p> <p>Policy SB7 contemplates an option where Sainsburys relocates from the Green Park Station West element of the wider allocation to the Homebase site and an alternative, if Sainsburys remain at Green Park West, of over 500 residential units, circa 14,000sq m of office floorspace, 7,000sq m of retail floorspace, a hotel and complementary food and beverage outlets. On the basis of this allocation, Sydenham Park would not be a suitable alternative to the application</p> |

| No. | Site Name                             | Description | Site Identified Via    | Site Plan | Site Size | Include on Short List ? / Initial assessment of Suitability and Availability   |
|-----|---------------------------------------|-------------|------------------------|-----------|-----------|--|
|     |                                       |             |                        |           |           | <p>site.</p> <p>Even if the adopted development plan allocation were to be set aside, the Homebase site is not large enough to accommodate all elements of the proposal and the proximity of residential properties at Bath Western Riverside would strongly indicate that an arena mixed use development would not sit well with protecting residential amenities.</p>  |
| 60  | Bath Quays North                      |             | B&NES Placemaking Plan |           | 2.2ha     | <p>The Bath Quays North site lies in Bath city centre and is, in principle, in a sequentially preferable location to the application site albeit Bath is not necessarily considered to be the optimum location for the arena mixed use development.</p> <p>The site is allocated in the development plan for an employment led mixed use development including a minimum of 20,000sq m of office floorspace, a minimum of 70 residential units and other complementary uses such as retailing and below ground car parking.</p> <p>Recently, outline planning permission has been granted for a comprehensive mixed use redevelopment, comprising B1, C1, C3, A1, A3, A4, D1 and D2 uses, with total combined floorspace of up to 38,000sqm, infrastructure (including basement car park) and associated development, including demolition of existing multi storey car park and amenity building. (18/00058/EREG03)</p> <p>At 2.2 hectares, the Bath Quays North site is too small to accommodate the proposed development even in a multi-level format and in any event is not a suitable or available alternative given the progress which B&amp;NES has made in securing outline planning permission for an office-led redevelopment scheme.</p> |
| 61  | Central Riverside & Recreation Ground | SB2         | B&NES Placemaking Plan |           |           | <p>Part of the central riverside and recreation ground area is allocated in the core strategy and place-making plan for a sporting, cultural and leisure stadium. The place-making plan notes that "Development proposals will enhance and intensify the leisure offer with more variety and year round use".</p> <p>It also notes that "The design will respond appropriately and creatively to its sensitive context within the World Heritage Site, including the importance of open views for example from Grand Parade, Orange Grove and Terrace Walk to the hillsides beyond, and the iconic view from North Parade</p>  |

| No. | Site Name                                  | Description | Site Identified Via                  | Site Plan | Site Size | Include on Short List ? / Initial assessment of Suitability and Availability  |
|-----|--|-------------|--------------------------------------|-----------|-----------|---|
|     |  |             |                                      |           |           | <p>Bridge to Pulteney Bridge and Weir. The range of views is to be agreed through the Development Brief and Landscape and Visual Impact Assessment process".</p> <p>Plans being consulted upon in 2018 show a replacement sports stadium with an 18,000 capacity (including community, conferencing and events space) along with a 40,000sq ft riverside park and a 700 space car park underneath the hybrid or artificial sports pitch. The stadium will also have a retractable roof. The consultation plans show that the open space areas to the east of the existing stadium are to be excluded from the planning application site area.</p> <p>The 2018 consultation information specifically notes that "<i>The stadium has not been designed for large scale music events</i>".</p> |
| 62  | North Keynsham                             | 7.1         | Draft Joint Spatial Plan             |           |           | To be dismissed on the basis of development plan strategy for housing and not sequentially preferable.  |
| 63  | Whitchurch                                 | 7.2         | Draft Joint Spatial Plan             |           |           | To be dismissed on the basis of development plan strategy for housing and not sequentially preferable.  |
| 64  | Bath Road Brislington                      | 7.3         | Draft Joint Spatial Plan             |           |           | To be dismissed on the basis of development plan strategy for housing and not sequentially preferable.  |
| 65  | The Galleries                              |             | Unallocated site                     |           |           | Include due to recent sale of site, poor performance of Galleries as a shopping destination and redevelopment potential.  |
| 66  | Avonmeads Retail Park and surrounding area |             | Unallocated site                     |           |           | Potentially include due to size of site and potential for Showcase and bowling alley to vacate.   |
| 67  | Bristol City FC, Ashton Gate               | BDA0302     | Draft Bristol Local Plan Review      |           |           | Include due to current proposals for 'conference centre' use.   |
| 68  | Dolphin Square, Weston-super-Mare          | SA1         | Weston Town Centre SPD               |           |           | Dismiss site on the basis of its size and the development plan strategy which allocates the site for residential, retail, student accommodation and food/beverage uses.   |
| 69  | Station Gateway, Weston-super-Mare         | SA1         | Weston Town Centre SPD               |           |           | To be dismissed on the basis of the development plan strategy for Weston town centre which prioritises this site for up to 600 residential units with supporting commercial, car parking and education uses.  |
| 70  | Locking Parklands                          | SA1         | North Somerset Site Allocations Plan |           |           | Site is close to the planned new local centre at Locking Parklands but is not in a sequentially preferable location in relation to Weston town centre, which is the salient centre in   |

| No. | Site Name                                      | Description | Site Identified Via                  | Site Plan | Site Size  | Include on Short List ? / Initial assessment of Suitability and Availability   |
|-----|--|-------------|--------------------------------------|-----------|------------|--|
|     |  |             |                                      |           |            | WSM for the purposes of the sequential test. Remaining land is large enough to accommodate the proposal although this land is allocated for residential and employment land uses and, on this basis, this site has not been taken forward for further consideration.   |
| 71  | West Wick Business Park                        | SA4         | North Somerset Site Allocations Plan |           | 4.7ha      | This is an out of centre site and 5km to the east of Weston-super-Mare town centre. The nearest other centre is Worle district centre which is 1km away. As a consequence it cannot be said that the West Wick Business Park site lies in a more accessible and better connected location to the application site. It is also allocated for employment uses in the recently adopted Site Allocations Plan and is expected to contribute towards employment land provision in WSM. On this basis, this site has not been taken forward for further consideration.   |
| 72  | Land South of Hurluin Way – the Avoncrest site | SA1         | North Somerset Site Allocations Plan |           | Circa 25ha | Site is large enough to accommodate the proposed development and lies in a sequentially preferable location as it is located within the defined boundary for Weston town centre. However, this site can be dismissed from the sequential test for two main reasons. First, Weston-super-Mare town centre is not a suitable or viable location for the proposal given its size and location. Second, site is allocated for alternative land uses in the recently adopted North Somerset Site Allocations Plan 2018. This includes 750 residential units, 2.5 hectares of employment land, new infrastructure and a primary school. Loss of this site for an alternative use would have a considerable detrimental impact upon the development plan strategy in North Somerset.  |
| 73  | Broadwalk Shopping Centre                      | BDA2201     | Draft Bristol Local Plan Review      |           | 2ha        | In-centre site which is too small to accommodate the proposal and in any event is proposed to be allocated for alternative residential-led development in the draft Bristol Local Plan Review. Site not taken forward for further consideration.   |
| 74  | Western Harbour, Bristol                       |             |                                      |           | See notes  | Western Harbour identified by BCC in its 2017 Investment Prospectus as an 'investment opportunity'. Prospectus notes that " <i>Removal of the heavy road infrastructure and replacement with less high impact options will release 15-20 hectares of developable land</i> ". It is unclear as to how these sizes have been arrived at, although it must be the case that part of the floating harbour has been included. If the floating harbour areas are removed and also the A Bond and B Bond listed warehouse buildings, then the northern part of the site extends to 2.8ha and the southern part 3.6ha. Assuming that all road infrastructure can be cleared from these sites, they are of a shape and size which are unsuitable for the proposal.<br><br>In addition, three further reasons are salient for dismissing |

| No. | Site Name | Description | Site Identified Via | Site Plan | Site Size | Include on Short List ? / Initial assessment of Suitability and Availability   |
|-----|-----------|-------------|---------------------|-----------|-----------|--|
|     |           |             |                     |           |           | <p>these sites. First, development of the proposal, which involves buildings of a significant mass and scale, on the larger (southern) site would have an unacceptable impact upon the setting of the two listed warehouse buildings.</p> <p>Second, the Investment Prospectus indicates that whilst commercial and leisure space is expected to be provided as part of any future redevelopment, the dominant use is expected to be 3,500 new homes which will be a top priority for BCC for this site.</p> <p>Third, redevelopment of this area is clearly a medium to longer term aspiration given the need to investigate redevelopment options for the site (which have not yet been concluded) and change significant amounts of road and other infrastructure in order to make land available for development. This is signified by the lack of proposed allocation of this site in the draft Bristol Local Plan Review.</p> <p>As a consequence, whilst this site could be taken forward for further assessment, given its size and significance, it is very likely that it will continue to be dismissed as a suitable and available alternative to the application site.</p> |

# Appendix XIII

## Financial Analysis

| Description   | Total £          |                    | Total £          |                    | Total £          |                    |
|---|------------------|--------------------|------------------|--------------------|------------------|--------------------|
| <b>Development costs</b>  |                  |                    |                  |                    |                  |                    |
| Original Site Purchase (part of site wide deal)                       | 8,000,000        |                    | 8,000,000        |                    | 8,000,000        |                    |
| Site Remediation  | 1,000,000        |                    | 1,000,000        |                    | 1,000,000        |                    |
| YTL Arena - Construction cost for Base solution including Prelims etc | 86,650,000       |                    | 99,650,000       |                    | 108,650,000      |                    |
| Demolitions, strip out & prepare building for alteration              | 3,839,000        |                    | 3,994,000        |                    | 3,994,000        |                    |
| Repairs to building for alteration- East/West hangars                 | -                |                    | 80,000           |                    | 160,000          |                    |
| Foundations to cores, lifts and floor screed throughout               | 1,698,000        |                    | 1,698,000        |                    | 1,750,000        |                    |
| Upper floors, bowl terracing including steel frame                    | 9,800,000        |                    | 11,488,000       |                    | 11,908,000       |                    |
| New Roofing & acoustic liner system                                   | 5,358,000        |                    | 5,442,000        |                    | 5,526,000        |                    |
| New Roofing to East/West hangars                                      | -                |                    | 1,490,000        |                    | 2,980,000        |                    |
| Staircases & Cores  | 450,000          |                    | 500,000          |                    | 600,000          |                    |
| External cladding, curtain walling & external doors                   | 3,593,000        |                    | 4,381,000        |                    | 4,791,000        |                    |
| External cladding, curtain walling to East/West hangars               | -                |                    | 2,499,000        |                    | 4,998,000        |                    |
| Internal Walls, Balustrades & internal doors                          | 5,707,000        |                    | 6,150,000        |                    | 6,560,000        |                    |
| Internal finishes - floors, wall & ceilings                           | 2,694,000        |                    | 2,719,000        |                    | 2,969,000        |                    |
| Internal finishes - East/West hangars                                 | -                |                    | 1,500,000        |                    | 3,000,000        |                    |
| Fixtures, fittings & seating  | 3,312,000        |                    | 3,547,000        |                    | 3,547,000        |                    |
| Mechanical & electrical works   | 21,228,000       |                    | 22,966,000       |                    | 23,401,000       |                    |
| Lifts & escalators  | 1,415,000        |                    | 1,800,000        |                    | 1,800,000        |                    |
| External works including Utilities & drainage                         | 4,050,000        |                    | 4,618,000        |                    | 4,918,000        |                    |
| Inflation and Contingency allowances                                  | 11,000,000       |                    | 11,692,000       |                    | 12,150,000       |                    |
| Preliminaries, OHP and tender costs                                   | 12,506,000       |                    | 13,086,000       |                    | 13,598,000       |                    |
|   | 86,650,000       |                    | 99,650,000       |                    | 108,650,000      |                    |
| Project / Design Team Fee Estimate                                    | 8,200,000        |                    | 8,200,000        |                    | 8,200,000        |                    |
| Additional land acquisition to afford access                          | 1,500,000        |                    | 1,500,000        |                    | 1,500,000        |                    |
| Access Bridge and associated infrastructure                           | 14,000,000       |                    | 14,000,000       |                    | 14,000,000       |                    |
| Operators final fit-out costs   | 5,000,000        |                    | 7,000,000        |                    | 9,000,000        |                    |
| Developers Legal Fees & Overheads                                     | 5,100,000        |                    | 5,700,000        |                    | 6,132,000        |                    |
| Financing costs   | 1,800,000        |                    | 2,010,000        |                    | 2,161,200        |                    |
| <b>Costs (including Inflation)</b>                                    | <b>Total</b>     | <b>131,250,000</b> | <b>Total</b>     | <b>147,060,000</b> | <b>Total</b>     | <b>158,643,200</b> |
| <b>Revenue - Arena (@ Year 3 trading per annum)</b>                   |                  |                    |                  |                    |                  |                    |
| Total revenue   | 12,800,000       |                    | 21,000,000       |                    | 31,200,000       |                    |
| Deduct Delivery costs   | 5,240,000        |                    | 9,800,000        |                    | 15,700,000       |                    |
|   |                  |                    |                  |                    |                  |                    |
| Operating Profit  | 7,560,000        |                    | 11,200,000       |                    | 15,500,000       |                    |
| Deduct Operational Costs  | 4,900,000        |                    | 5,500,000        |                    | 6,400,000        |                    |
|   |                  |                    |                  |                    |                  |                    |
| <b>EBITDA</b>   | <b>2,660,000</b> |                    | <b>5,700,000</b> |                    | <b>9,100,000</b> |                    |
| <b>Revenue - Exhibition Space (@ Year 3 trading per annum)</b>        |                  |                    |                  |                    |                  |                    |
| Total revenue   |                  |                    | 4,700,000        |                    | 4,700,000        |                    |
| Deduct Delivery costs   |                  |                    | 1,200,000        |                    | 1,200,000        |                    |
|   |                  |                    |                  |                    |                  |                    |
| Operating Profit  |                  |                    | 3,500,000        |                    | 3,500,000        |                    |
| Deduct Operational Costs  |                  |                    | 1,200,000        |                    | 1,200,000        |                    |
|   |                  |                    |                  |                    |                  |                    |
| <b>EBITDA</b>   | <b>0</b>         |                    | <b>2,300,000</b> |                    | <b>2,300,000</b> |                    |
| <b>Revenue - The Hub (@ Year 3 trading per annum)</b>                 |                  |                    |                  |                    |                  |                    |
| Total Lease Revenue   |                  |                    |                  |                    | 3,700,000        |                    |
| Operating Profit  |                  |                    |                  |                    | 3,700,000        |                    |
| Deduct Operational Costs (centrally absorbed in Arena)                |                  |                    |                  |                    | 0                |                    |
|   |                  |                    |                  |                    |                  |                    |
| <b>EBITDA</b>   | <b>0</b>         |                    | <b>0</b>         |                    | <b>3,700,000</b> |                    |
| <b>SUMMARY</b>  |                  |                    |                  |                    |                  |                    |
| <b>Total Revenue</b>  | 12,800,000       |                    | 25,700,000       |                    | 39,600,000       |                    |
| <b>Total EBITDA</b>   | 2,660,000        |                    | 8,000,000        |                    | 15,100,000       |                    |
| <b>% Return</b>   | 2.00%            | %                  | 5.00%            | %                  | 9.50%            | %                  |